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FILED
U.S. DISTRICT COURT
DISTRICT OF WYOMING
2016 MAY -4 PM 4:41
STEPHAN HARRIS, CLERK
CASPER

Robert L. Powley (Attorney-in-Charge)
New York State Bar No. 2467553
(pro hac vice motion to be filed)
Thomas H. Curtin
New York State Bar No. 2122364
(pro hac vice motion to be filed)
Patrick B. Monahan
New York State Bar No. 4681573
(pro hac vice motion to be filed)

Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

TRINITY TEEN SOLUTIONS, INC.,

Plaintiff,

v.

CLAIRE MALONE MATSON, CHANEL
PLANDER, AND MOLLIE NICOLE
LYNCH,

Defendants.

Civil Action No.

16 CV 110-F

PETITION AND NOTICE OF REMOVAL

Notice is hereby given that pursuant to 28 U.S.C. § 1332, Defendants Claire Malone Matson, Chanel Plander, and Mollie Nicole Lynch (hereinafter collectively referred to as "Defendants") hereby petition for removal of this action from the Fifth Judicial District Court of Park County, Wyoming, to the United States District Court for the District of Wyoming. In support thereof, Defendants state the following as grounds for removal of this action:

Receipt # CAS1642
Summons: issued
✓ not issued

INTRODUCTION

1. This lawsuit arises out of statements made via the Internet by Defendants regarding their experiences at the treatment center operated by Plaintiff Trinity Teen Solutions, Inc. (hereinafter “Plaintiff” or “Trinity”) for troubled teenage girls. Plaintiff alleges that Defendants’ statements are false and defamatory; that Defendants are engaged in a conspiracy to damage Plaintiff’s reputation; and that Defendants are interfering with Plaintiff’s ongoing business relationships and prospective economic advantage. Plaintiff seeks both compensatory and exemplary damages, as well as injunctive relief.

STATE COURT CIVIL ACTION NO. 28343

2. On March 17, 2016, Plaintiff filed a Complaint in the Fifth Judicial District Court of Park County, Wyoming styled *TRINITY TEENS SOLUTIONS, INC., a Wyoming Corporation v. CLAIRE MALONE MATSON, CHANEL PLANDER, and MOLLIE NICOLE LYNCH*, Civil Action No. 28343 (hereinafter the “State Court Action”). Defendants are the only named defendants in the Complaint. A copy of the Summons and Complaint was served on Defendant Matson on April 4, 2016; on Defendant Plander on March 31, 2016; and on Defendant Lynch on March 30, 2016.

3. Plaintiff asserts the following causes of action against all of the Defendants: (1) libel per se; (2) interference with prospective economic advantage; and (3) civil conspiracy. Complaint, ¶¶ 25-56. Plaintiff seeks relief in the form of: (1) compensatory damages; (2) pecuniary losses, including lost time, loss of business, loss of good will, loss of customers, expenses related to addressing Defendants’ alleged false statements, travel expenses, attorneys’ fees and related costs; (3) attorneys’ fees, litigation costs and expenses; (4) exemplary, or punitive, damages (including attorneys’ fees and costs); (5) affirmative relief requiring Defendants to remove any allegedly false and/or defamatory statements about Plaintiff from the Internet, including social

media, and requiring Defendants to periodically report and demonstrate compliance with this requirement to the Court; (6) a permanent injunction preventing Defendants or their agents from posting false and defamatory statements on the Internet, including social media, or other electronic means of communication (presumably including e-mail) regarding Plaintiff, its owners, employees, accommodations and services; (7) a permanent injunction preventing Defendants or their agents from communicating with past or future Trinity “patients or patient families”; and (8) any other relief the Court deems just and equitable. Complaint, pp. 8, 12-13, ¶¶ 35(c), WHEREFORE (a)-(h).

PROCEDURAL REQUIREMENTS

4. This Petition and Notice of Removal is timely under 28 U.S.C. § 1446(b)(2)(C) because it is filed within thirty (30) days of Defendant Matson’s receipt of the Summons and Complaint.
5. All Defendants consent to removal.
6. This action is properly removed to this Court because the State Court Action is pending within this district. 28 U.S.C. § 1441.
7. The United States District Court for the District of Wyoming has diversity jurisdiction over this action. 28 U.S.C. § 1332(a).
8. Pursuant to 28 U.S.C. § 1446(a), attached hereto as Exhibit A is a true and correct copy of the entire file of record with the Court in the State Court Action.
9. Simultaneously with the filing of this Petition and Notice of Removal, Defendants are filing a copy of the Petition and Notice of Removal in the Fifth Judicial District Court of Park County, Wyoming, pursuant to 28 U.S.C. § 1446(d).

THIS COURT HAS DIVERSITY JURISDICTION

A. There Is Complete Diversity of Citizenship Between the Parties

10. Plaintiff is incorporated in the State of Wyoming and maintains its principal place of business in Park County, Wyoming. Complaint, ¶ 1. A corporation is deemed a citizen of the state in which it is incorporated and the state in which its principal place of business is located. 28 U.S.C. § 1332(c)(1). Thus, Plaintiff is a citizen of Wyoming.

11. Defendant Matson lives in Coral Gables, Florida and is domiciled in Miami-Dade County, Florida. Complaint, ¶ 12. Defendant Plander lives in Thousand Oaks, California and is domiciled in Ventura County, California. *Id.*, ¶ 13. Defendant Lynch lives in Milton, Florida and is domiciled in Santa Rosa County, Florida. *Id.*, ¶ 14. Consequently, Defendants Matson and Lynch are citizens of the State of Florida, and Defendant Plander is a citizen of California. *See Durlacher v. Hoffschneider*, 924 F.Supp.2d 1246, 1249 (D. Wyo. 2013) (citing *Crowley v. Glaze*, 710 F.2d 676, 678 (10th Cir. 1983)); 15 James Wm. Moore et al., *Moore's Federal Practice* § 102.34(2) (3d ed. 2012)) (noting that for purposes of diversity, a person is a citizen of the state in which the person is domiciled, that is, the state in which the person (1) is physically present and (2) has the intent to make a home).

12. Because Plaintiff is not a citizen of Florida or California, and no Defendant is a citizen of Wyoming, complete diversity exists in this matter. 28 U.S.C. § 1332(a).

B. The Amount in Controversy Exceeds the Minimum Requirement

I. Legal Standard

13. Where the complaint does not specify an exact amount of the plaintiff's alleged damages, "courts generally require that a defendant establish the jurisdictional amount by a preponderance of the evidence." *Martin v. Franklin Capital Corp.*, 251 F.3d 1284, 1290 (10th Cir. 2001). The preponderance of the evidence standard "applies to jurisdictional facts, not jurisdiction itself . . .

‘[w]hat the proponent of jurisdiction must ‘prove’ is contested factual assertions . . .

[i]urisdiction itself is a legal conclusion, a consequence of the facts rather than a provable ‘fact.’”

McPhail v. Deere & Co., 529 F.3d 947, 954 (10th Cir. 2008) (quoting *Meridian Sec. Ins. Co. v.*

Sadowski, 441 F.3d 536, 640-43) (7th Cir. 2006)). Defendants “must affirmatively establish

jurisdiction by proving jurisdictional *facts* that [make] it *possible* that \$75,000 [is] in play.” *Id.*

(affirming district court determination that more than \$75,000 was in controversy despite the fact

that plaintiff’s complaint only sought relief “in an amount in excess of Ten Thousand Dollars.”).

The amount in controversy “is not proof of the amount the plaintiff will recover . . . it is *an*

estimate of the amount that will be put at issue in the course of the litigation.” *Id.* at 956

(emphasis added). Finally, if multiple defendants are jointly and severally liable, the amounts of

those claims may be aggregated to satisfy the amount-in-controversy requirement. *De La Rosa v.*

Reliable, Inc., 113 F.Supp.3d 1135, 1151 (D.N.M. 2015) (internal citations omitted).

14. The Tenth Circuit has highlighted several methods by which defendants seeking to remove can satisfy the amount in controversy requirement where, as here, the complaint is not definitive on the issue. First, defendants “may rely on an estimate of the potential damages from the allegations in the complaint. A complaint that presents a combination of facts and theories of recovery that may support a claim in excess of \$75,000 can support removal.” *McPhail*, 529 F.3d at 955. When a statute permits recovery of attorney’s fees, “a reasonable estimate may be used in calculating the necessary jurisdictional amount in a removal proceeding based upon diversity of citizenship.” *Miera v. Dairyland Ins. Co.*, 143 F.3d 1337, 1340 (10th Cir. 1998) (including an estimate of attorney’s fees plaintiff would incur over the remainder of litigation in the jurisdictional amount in affirming the lower court denial of plaintiff’s motion to remand).

Second, defendants may also rely on other “summary judgment-type evidence”, such as affidavits attesting to jurisdictional facts, or interrogatories obtained in state court, submitted in

support of jurisdiction. *McPhail*, 529 F.3d at 956 (quoting *Manguno v. Prudential Prop. & Cas. Ins. Co.*, 276 F.3d 720, 723 (5th Cir. 2002)). Finally, in the Tenth Circuit, if a plaintiff seeks injunctive relief, the amount in controversy is measured by the value of the object of the litigation – that is, either the value to the plaintiff, or the cost to the defendant, of said injunctive relief. *Lovell v. State Farm Mutual Auto. Ins. Co.*, 466 F.3d 893, 897 (10th Cir. 2006) (citing *Hunt v. Washington State Apple Adver. Comm'n*, 432 U.S. 333, 347 (1977); *Justice v. Atchison, Topeka and Santa Fe Ry. Co.*, 927 F.2d 503, 505 (10th Cir. 1991)).

II. Plaintiff's Complaint Demonstrates More Than \$75,000 Is In Controversy

15. Plaintiff's Complaint does not allege a specific amount of damages – it only alleges that “The amount in controversy exceeds \$50,000.” Complaint, ¶ 10 (emphasis added). That amount was pleaded to satisfy the jurisdictional amount requirement to allow Plaintiff to bring this case in one of the nine District Courts of Wyoming rather than in the Circuit Courts of Wyoming. *See* WYO. STAT. § 5-9-128(a)(i) which establishes that circuit courts have exclusive original jurisdiction within Wyoming for “an action where the prayer for recovery is an amount not exceeding fifty thousand dollars (\$50,000.00), exclusive of court costs.” The Complaint, however, contains a combination of facts and theories of recovery which, when taken as a whole, indicate that more than the \$75,000 federal court jurisdictional minimum is in controversy. Specifically, Plaintiff asserts three causes of action against each of the Defendants, for each of which it seeks to hold Defendants jointly and severally liable: (1) libel per se, (2) interference with prospective economic advantage, and (3) civil conspiracy. Complaint, ¶¶ 25-56. Plaintiff demands judgments against Defendants, jointly and severally, as follows:

- (a) For Compensatory damages;
- (b) For pecuniary losses including lost time, loss of business, loss of good will, expenses related to addressing the false statements, travel expenses, attorneys fees, expenses and costs;

- (c) For attorneys fees, costs and expenses as they may be allowed and associated with the claims alleged herein;
- (d) For exemplary damages, including attorney's fees and costs;
- (e) For affirmative relief which mandates that Defendants or anyone acting on the behalf of Defendants be required to remove any false and/or defamatory statements about Plaintiff, its owners, employees and/or services as published on the World Wide Web, social media, electronic means or otherwise, and to periodically report and demonstrate compliance of the same to the Court.
- (f) For affirmative relief which enjoins Defendants or any third party acting on behalf of Defendants from posting false and defamatory statements on the World-Wide web, social media, and other electronic means of or concerning Plaintiff, its owners, employees, accommodations and services.
- (g) For affirmative relief which enjoins Defendants or any third party acting on behalf of Defendant [sic] from communicating with past or future patients or patient families of [Plaintiff's treatment center] in a false or defamatory manner regarding [Plaintiff's treatment center], its employees, owners, accommodations or services through the World Wide Web, Social [sic] media or other electronic means and to periodically report compliance with the Court.
- (h) For any other relief the Court deems just and equitable in the premises.

Complaint, pp. 12-13, WHEREFORE (a)-(h).

A. Plaintiff's Lost Business

16. In its Complaint, Plaintiff seeks damages for, *inter alia*, loss of business (including loss of customers), loss of good will (including loss of reputation resulting in "shame and humiliation"), and lost time and attorney's fees incurred by Plaintiff in addressing the alleged defamatory statements of Defendants. Complaint, ¶¶ 35-36. According to excerpts from Plaintiff's website, Plaintiff operates a residential school / treatment center for troubled teenage girls offering highly individualized treatment incorporating a vast variety of therapies including, but not limited to: behavior modification, psychiatric consultation and medication regime modification, religious-centered counseling, career counseling, group therapy, family systems therapy, experiential therapy, wilderness therapy, and animal assisted therapy. Declaration of

Patrick B. Monahan in Support of Defendants' Petition and Notice of Removal ("Monahan Dec."), Exhibit B, pp. 1-3, 5-6. These therapies are implemented over the course of a resident's treatment, the average length of which takes "about 18 months" to complete. *Id.*, pp. 8, 11.

During their stay, residents also participate in "traditional courses required for graduation from a Catholic boarding school." *Id.*, p. 15. Plaintiffs charge all-inclusive tuition for this treatment and educational program. *Id.*, p. 11. This tuition also includes, but is not limited to, room and board ("high protein, complex carbohydrate foods"), clothing, toiletries, 24-hour staff supervision, "Personality Inventories and Clinical Assessments," and "pharmaceutical grade nutritional supplements." *Id.* Plaintiff's website offers assistance with determining health insurance coverage for tuition, as well as prominently featuring advertisements for Prosper Healthcare Lending, indicating that tuition for Plaintiff's program, while not listed on Plaintiff's website, is substantial. *Id.*, pp. 3, 6, 9, 12, 15, 17-19.

17. Indeed, according to the testimonial of "Kelsie V.", a former student, on the Yelp page Plaintiff submitted as Exhibit C to its Complaint, "TRINITY COSTS NEARLY \$300 A DAY." Complaint, Exhibit C, p. 2.

18. The Declaration of Claire Malone Matson is attached as Exhibit C to this Petition and Notice of Removal. As Exhibit A to the accompanying Declaration of Defendant Claire Malone Matson In Support of Defendants' Petition and Notice of Removal ("Matson Dec.") indicates, the form of Financial Contract and Tuition Agreement used by Plaintiff in 2004, a dozen years ago, quotes a price of \$195 per day, or \$5,850.00 per month, as the cost of enrollment in its "Residential Program." The prices per day for Plaintiff's "Acute Program" and "Subacute Program" are significantly higher. *See* Ex. A to Matson Dec., pp. 3-4.

19. Assuming an average stay of 18 months for a "resident" (as set forth on Plaintiff's website), and assuming enrollment at the lowest level of care (i.e., the "Residential Program"),

the minimum cost of enrollment for an average-length stay at Plaintiff's facility is \$105,300.00 (in 2004 U.S. Dollars). *See* Ex. A to Monahan Dec., pp. 8, 11.

20. Here, Defendant Matson stayed 17 months at Trinity, and Defendant Lynch spent over 2 years at Trinity. *See* Matson Dec., ¶ 3; *and see* Declaration of Mollie Nicole Lynch in Support of Defendants' Petition and Notice of Removal ("Lynch Dec."), ¶ 3 which is attached as Exhibit D to this Petition and Notice of Removal. Defendant Lynch estimates that her family paid Plaintiff \$223,000 for her two-year stay. Lynch Dec., ¶ 4. Mr. O. Mark Jerde, the father of Michelle N. Jerde, who was a resident at Trinity from approximately February 2005 through December 2006, paid over \$70,000.00 for only a part of his daughter's 22-month stay at Trinity. *See* Declaration of O. Mark Jerde in Support of Defendants' Petition and Notice of Removal, ¶¶ 5-6, which is attached as Exhibit E to this Petition and Notice of Removal.

21. In view of the aforementioned evidence and Plaintiff's own claim as to the average length of treatment, Plaintiff's loss of even one student as a result of Defendants' allegedly defamatory statements places substantially more than \$75,000 in controversy, meeting the jurisdictional minimum.

B. Attorney's Fees

22. A "reasonable estimate" of the attorney's fees that would be incurred over the course of the instant case provides further support for the proposition that Plaintiff's Complaint, on its face, places more than \$75,000 in controversy. *Miera v. Dairyland Ins. Co.*, 143 F.3d at 1340 (combining current and projected attorney's fees with specified damages to find that the complaint demonstrated more than the jurisdictional minimum was in controversy). The instant case will necessarily be an extremely fact-intensive litigation (as truth is a defense to libel claims) that will involve discovery, testimony and/or affidavits from Plaintiff's staff, Defendants, and former residents of Plaintiff's facility. At this early stage in the proceeding it is not

unreasonable to estimate that Plaintiff may incur tens of thousands of dollars in fees and costs prosecuting this case through trial (and, if necessary, appeal). These reasonably estimated attorney's fees, when combined with the alleged damages, fees and costs in the Complaint, make it clear that more than \$75,000 is in controversy and the jurisdictional minimum has been met.

C. Exemplary Damages

23. Plaintiff's request for exemplary, or punitive, damages only further supports the proposition that Plaintiff's Complaint, on its face, places more than \$75,000 in controversy. Plaintiff alleges that Defendants' conduct was "intentional, wanton and malicious" and urges the Court to award it exemplary damages on all three counts alleged in the Complaint "in an amount to deter such future conduct and to protect society from Defendants." Complaint, ¶¶ 24, 38, 49, 56. Where state law allows for an award of exemplary damages, said damages may be considered in determining whether the jurisdictional minimum has been met. *Woodmen of The World Life Ins. Society v. Manganaro*, 342 F.3d 1213, 1218 (10th Cir. 2003). Wyoming state law recognizes awards of exemplary, or punitive, damages where, as here, willful and wanton conduct is alleged. *Verschoor v. Mountain West Farm Bureau Mut. Ins. Co.*, 907 P.2d 1293, 1301 (Wyo. 1995) (quoting *Danculovich v. Brown*, 593 P.2d 187, 191 (Wyo. 1979)); and see *Lompe v. Sumridge Parthers, LLC et al*; No. 14-8082; ___ F.3d ___ (10th Cir 2016) (decided 4/1/16) (remitting a \$22,500,000 punitive damage award to \$1,950,000 where willful and wanton misconduct was established). Considering the claimed magnitude of Plaintiff's alleged lost business and damaged reputation resulting from Defendants' allegedly defamatory statements, it is not unreasonable to estimate that exemplary damages "to deter [Defendants from] such future conduct and protect society from Defendants" would be in the range of tens of thousands of dollars. Complaint, ¶¶ 38, 49, 56. These exemplary damages, particularly when combined with

reasonable attorney's fees and the damages alleged by Plaintiff in its Complaint, make it clear that the jurisdictional minimum has been met on the face of the Complaint.

III. The Value of the Object of the Litigation Is Greater than \$75,000

24. Because Plaintiff is seeking injunctive relief, the value of the object of the litigation may be considered – either the value to the plaintiff, or cost to the defendant, of the injunctive relief sought. *See Lovell*, 466 F.3d at 897. Plaintiff repeatedly makes reference to Defendants' alleged "mission" or "goal" to "destroy" Plaintiff.¹ Plaintiff alleges a laundry list of damages, asserting that more than \$50,000 is already in controversy, just from the effects of Defendants' alleged "mission" to date. If Plaintiff's allegations are taken as true, if a Court refuses to grant the injunctive relief Plaintiff seeks, Defendants' alleged "mission" to destroy Plaintiff's business will be permitted to go on, placing Plaintiff's entire business at stake. Plaintiff's business, the value of the object of this litigation for Plaintiff, is a residential treatment center providing various types of therapy to teenage patients from all over the United States, and is no doubt valued at more than \$75,000. The jurisdictional minimum has therefore been met.

CONCLUSION

WHEREFORE, Defendants petition for removal of the State Court Action from the Fifth Judicial District Court of Park County, Wyoming to the United States District Court for the District of Wyoming, so that this Court may assume jurisdiction over the cause as provided by law.

Respectfully submitted this 4th day of May, 2016.

Respectfully submitted,


¹ See Complaint, ¶¶ 15(c), 16, 20, 22-23.

CLAIRE MALONE MATSON,
CHANEL PLANDER, and
MOLLIE NICOLE LYNCH

Defendants

Dated: May 4, 2016

By:


Patrick J. Murphy, W.S.B. No. 5-1779
David E. Shields, W.S.B. No. 7-4718
WILLIAMS, PORTER, DAY & NEVILLE, P.C.
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New York State Bar No. 4681573
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thcurtin@powleygibson.com
pbmonahan@powleygibson.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been sent via U.S. Mail to the following counsel of record on this 4th day of May, 2016:

S. Joseph Darrah
Darrah Law Office, P.C.
254 E. 2nd Street
Powell, WY 82435



Patrick J. Murphy

EXHIBIT

A

Park County District Court**Docket Sheet**

Case #	CV-028343	Judge	Hon. Steven Cranfill
Case Title	Trinity Teen Solutions Inc v. Matson et al	Case Type	Civil - Tort - Unspecified

Filed Date	Docket Entry Type	Description	Submitted By
03-17-2016	Summons - Issued	Summons Issued (3)	Mr. Stephen Joseph Darrah On Behalf of Trinity Teen Solutions Inc
03-17-2016	Cover Sheet - Cover Sheet	Cover Sheet	Mr. Stephen Joseph Darrah On Behalf of Trinity Teen Solutions Inc
03-17-2016	Complaint - Complaint	Complaint & Jury Demand (6 Person)	Mr. Stephen Joseph Darrah On Behalf of Trinity Teen Solutions Inc

STATE OF WYOMING

TRINITY TEEN SOLUTIONS, INC. A
WYOMING CORPORATION

Case No.: 28343

Plaintiff,

vs.

AFFIDAVIT OF SERVICE

CLAIRE MALONE MATSON, CHANEL
PLANDER, AND MOLLIE NICOLE
LYNCH



910919

Defendant.

Pursuant to the request of GRIZZLY INVESTIGATIVE SERVICES, received this process on 03/29/2016 at 11:30 AM to be served upon:

CLAIRE MALONE MATSON

STATE OF FLORIDA
COUNTY OF DADE ss.

I, Dionisio Delgado, depose and say that: I am authorized to serve this process in the circuit/county it was served in.

On 04/04/2016 at 8:27 PM, I served the within SUMMONS / COMPLAINT AND JURY DEMAND / EXHIBITS on CLAI RE MALONE MATSON at 2801 FLORIDA AVE APT. 202, MIAMI, FL33133 in the manner indicated below:

INDIVIDUAL SERVICE: - F.S. 48.031 (1)(a): By delivering to the within named person a true copy of this process with the date and hour of service endorsed thereon by me, and a copy of the complaint, petition or other initial pleading or paper (if any) and informing the person of the contents.

Description of person process was left with:

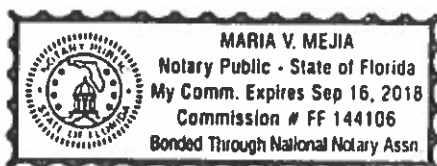
Sex: FEMALE - Skin: WHITE - Hair: BLONDE - Age: 26 - Height: 5'7 - Weight: 121-140

I hereby certify that I am not a party to the above action or suit and I am over the age of 18 years.

Signed and sworn to before me on
this 11th day of April, 2016
by an affiant who is personally known to me
or produced identification.

Notary Public

X
Dionisio Delgado
Cert/App#: 1024 - Dade County
JOSE H. MEJIA PI, INC
161 BENTLEY DRIVE
MIAMI, FL33166
305-871-6477



STATE OF WYOMING }
 }ss.
COUNTY OF PARK }

IN THE DISTRICT COURT
FIFTH JUDICIAL DISTRICT
CIVIL NO.

28343

**TRINITY TEEN SOLUTIONS, INC., a
Wyoming Corporation;**

Plaintiff,

-vs-

**CLAIRE MALONE MATSON, CHANEL
PLANDER, and MOLLIE NICOLE
LYNCH,**

Defendants.

REC'D _____
SERVED _____
DATE 04-04-16 8:22 PM
PS _____
(PRINT NAME)

FILED IN THE CIRCUIT COURT OF
JUDICIAL CIRCUIT CERT 1024

SUMMONS

To the above named Defendant: **Claire Malone Matson** **2801 FLORIDA AVE**
532 SAN ESTEBAN AVE. **APT. 202**
CORAL GABLES FL 33146-13 **MIAMI, FL 33133**

YOU ARE HEREBY SUMMONED and required to file with the Clerk and serve upon the Plaintiff's attorney an answer to the Complaint which is herewith served upon you, within twenty (20) days after service of this Summons upon you, exclusive of the day of service. (If service upon you is made outside of the state of Wyoming, you are required to file and serve your answer to the Complaint within thirty (30) days after service of this Summons upon you, exclusive of the day of service.) If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint.

DATED this 17th day of March, 2016.

(Seal of the District Court)

PATRA LINDENTHAL
CLERK OF DISTRICT COURT

By: *Chanel Plander*
Deputy Clerk

Darrah Law Office, P.C.
Attorneys for Plaintiff
254 East Second Street



Powell, WY 82435
(307)754-2254/(307)754-5656 FAX

STATE OF _____] **RETURN**
] ss.
 COUNTY OF _____]

I, _____, Sheriff in and for said County of _____, in the State aforesaid, do hereby certify that I received the within Summons, together with a copy of the Complaint filed in the above entitled matter, and that I served the same in the County aforesaid on the _____ day of _____, 2016, by delivering a copy of the same together with a copy of the Complaint, to: _____

Sheriff's Fees

Service \$ _____
 Mileage \$ _____
 Return \$ _____
 Total \$ _____

SHERIFF

By: _____
 Deputy Sheriff

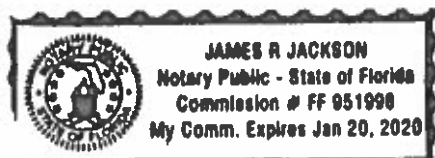
AFFIDAVIT OF SERVICE

STATE OF _____]
] ss.
 COUNTY OF _____]

To be used by a person other than Wyoming
 Sheriff, Under Sheriff or Deputy

I, Dawn Younger, being first duly sworn, on oath deposes and says that she is over the age of 21 years and is not a party to the foregoing action or interested therein, and that she has made service of the said **SUMMONS** in the County aforesaid on the 30 day of March 2016, by delivering a copy of the same, together with a copy of the Complaint, to: Mollie Lynch, personally at 5113 Westport Dr. Victor, FL 32570, Santa Rosa County, March on this 30 day of _____, 2016.

SUBSCRIBED and sworn to before me this 30 day of MARCH, 2016.



NOTARY PUBLIC

My commission expires: NOV 2020

AFFIDAVIT OF SERVICE

State of Wyoming

County of Park

District Court Fifth Judicial Court

Case Number: CIVIL NUMBER 28343



YOU2016000479

Plaintiff:

TRINITY TEEN SOLUTIONS, INC. a Wyoming Corporation;

vs.

Defendant:

CLAIRE MALONE MATSON, CHANEL PLANDER, and MOLLIE NICOLE LYNCH,

For:

Grizzly Investigative Services
800 S Fork Road
Cody, WY 82414

Received by Grizzly Investigative Services on the 28th day of March, 2016 at 8:19 pm to be served on MOLLIE NICOLE LYNCH, 5113 WESTPORT DR, MILTON, FL 32570-4027.

I, Dawn Young, being duly sworn, depose and say that on the 30th day of March, 2016 at 7:30 pm, I:

INDIVIDUALLY/PERSONALLY served by delivering a true copy of the Summons and Complaint with the date and hour of service endorsed thereon by me, to: MOLLIE NICOLE LYNCH at the address of: 5113 WESTPORT DR, MILTON, FL 32570-4027, and informed said person of the contents therein, in compliance with state statutes.


Military Status: Based upon inquiry of party served, Defendant is not in the military service of the United States of America.

Marital Status: Based upon inquiry of party served, Defendant is not married.

Description of Person Served: Age: 20s, Sex: F, Race/Skin Color: W, Height: 135, Weight: 5'3, Hair: BROWN, Glasses: N

I certify that I am over the age of 18, have no interest in the above action, and am a Certified Process Server, in good standing, in the judicial circuit in which the process was served.

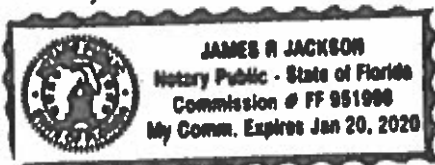
Subscribed and Sworn to before me on the 31st day of March, 2016 by the affiant who is personally known to me.


NOTARY PUBLIC


Dawn Young
588

Grizzly Investigative Services
800 S Fork Road
Cody, WY 82414
(307) 587-8395

Our Job Serial Number: YOU-2016000479



STATE OF _____]
] ss.
 COUNTY OF _____]

RETURN

I, _____, Sheriff in and for said County of _____, in the State aforesaid, do hereby certify that I received the within Summons, together with a copy of the Complaint filed in the above entitled matter, and that I served the same in the County aforesaid on the _____ day of _____, 2016, by delivering a copy of the same together with a copy of the Complaint, to: _____

Sheriff's Fees

Service \$ _____
 Mileage \$ _____
 Return \$ _____
 Total \$ _____

SHERIFF

By: _____
 Deputy Sheriff

AFFIDAVIT OF SERVICE

STATE OF CALIFORNIA]
] ss.
 COUNTY OF VENTURA]

To be used by a person other than W/oming
 Sheriff, Under Sheriff or Deputy

I, PAUL DRYMAN, being first duly sworn, on oath deposes and says that she is over the age of 21 years and is not a party to the foregoing action or interested therein, and that she has made service of the said SUMMONS in the County aforesaid on the 31ST day of MARCH, 2016, by delivering a copy of the same, together with a copy of the Complaint, to: CHANEL PLANDER, personally at 593 N. MOORPARK ROAD, SUITE D, THOUSAND OAKS, CALIFORNIA 91362 VENTURA County, _____ on this 31ST day of MARCH, 2016.

Paul Dryman

SUBSCRIBED and sworn to before me this _____ day of _____, 2016.

PLEASE SEE ATTACHED CALIFORNIA
 NOTARY PUBLIC
 My commission expires: JVRAT

CALIFORNIA JURAT WITH AFFIANT STATEMENT**GOVERNMENT CODE § 8202**

- ☒ See Attached Document (Notary to cross out lines 1-6 below)
☐ See Statement Below (Lines 1-6 to be completed only by document signer[s], not Notary)

Signature of Document Signer No. 1

Signature of Document Signer No. 2 (if any)

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of VENTURA

Subscribed and sworn to (or affirmed) before me

on this 1ST day of APRIL, 2016,
 by _____
 Date Month Year

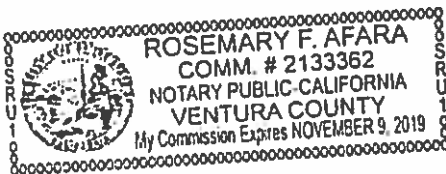
(1) PAUL DRYMAN

(and (2) _____),

Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence
 to be the person(s) who appeared before me.

Signature _____
 Signature of Notary Public



Seal
 Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached DocumentTitle or Type of Document: AFFIDAVIT OF SERVICE Document Date: _____Number of Pages: ONE Signer(s) Other Than Named Above: NONE

CIVIL COVER SHEET

This civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleadings or other papers as required by law. This form, approved by the Wyoming Supreme Court, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE SECOND PAGE OF THIS FORM)

I. CAPTION

Trinity Teen Solutions, Inc.,
89 Rd 8 RA, Powell, WY 82435
 Plaintiff Name and Current Address

v.

Claire Malone Matson, Chanel Pander, and
Mollie Nicole Lynch.
 Defendant.

Docket # 28343PATRA LINDENTHAL
Clerk of District CourtFILED MAR 17 2016by Janell Boone
Deputy**II. NATURE OF SUIT** (Place an "X" in One Box Only)**GENERAL CIVIL****CONTRACT**

- ☐ Business Organization Litigation
☐ Com. Const. Contract Litigation
☐ Contract Other (not Debt Collection)

TORT

- ☐ PI or WD - Environmental or Toxic Tort
☐ PI or WD - Fed Employer Liability Act
☐ PI or WD - Medical Malpractice
☐ PI or WD - Product Liability
☐ PI or WD - Vehicular
☐ Personal Injury Unspecified
☒ Property Damage
☐ Tort Unspecified
☐ Wrongful Termination of Employment

CIRCUIT COURT

- ☐ Small Claims
☐ Forcible Entry and Detainer
☐ Stalking Protection Order
☐ Family Violence Protection Order

DISSOLUTION OF MARRIAGE

- ☐ Divorce w/Minor Children
☐ Divorce w/o Minor Children
☐ Judicial Separation
☐ Annulment

DOMESTIC RELATIONS

- ☐ Custody/Parental Visitation
☐ Grandparental Visitation
☐ Paternity
☐ Child Support/Parental Contribution
☐ Child Support w/ Paternity
☐ UIFSA w/ Paternity
☐ UIFSA
☐ Dom Register Foreign Judgment
☐ TPR State/DFS
☐ TPR Family/Private

PROPERTY

- ☐ Property with Mineral Rights
☐ Property w/o Mineral Rights

PROBATE

- ☐ Ancillary Admin/Foreign Prob
☐ Decree of Title Distribution
☐ Determination of Heirship
☐ Letters of Administration
☐ Estate Unspecified
☐ Summary Probate
☐ Testate/Intestate Estate
☐ Will Only Filings
☐ Trust Matters
☐ Guardianship
☐ Conservatorship
☐ Guardian & Conservatorship

ADOPTION

- ☐ Adoption
☐ Confidential Intermediary

OTHER CIVIL

- ☐ Appointment/Removal of a Fiduciary
☐ Arbitration Award Confirmation
☐ Birth Certificate Amendment/Establishment
☐ Debt Collection
☐ Declaratory Judgment
☐ Emancipation of Minor
☐ False or Frivolous Lien
☐ Foreign Judgment
☐ Foreign Protection Order/Foreign Stalking Order
☐ Forfeiture of Property
☐ Governmental Action Environmental Case
☐ Injunction
☐ Material Witness/Foreign Subpoena
☐ Name Change
☐ Involuntary Hospitalization
☐ Public Nuisance
☐ Specific Relief
☐ Structured Settlement Protection Act
☐ Successor to Civil Trust Appointment
☐ Transcript Judgment from Circuit Court
☐ Writ of Habeas Corpus
☐ Writ of Mandamus
☐ Writ of Replevin
☐ Unspecified

III. RELATED CASE(S) IF ANY (see instructions)

Docket No. _____ Judge _____ Court (if different) _____
 Docket No. _____ Judge _____ Court (if different) _____

IV. \$ AMOUNT IN CONTROVERSY, (estimated) (see instructions)\$ 50,000.00

SIGNATURE OF ATTORNEY OF RECORD OR PRO SE LITIGANT

DATE

3/16/16

13
STATE OF WYOMING]
COUNTY OF PARK] ss.
]

IN THE DISTRICT COURT
FIFTH JUDICIAL DISTRICT
CIVIL NO. **28343**

**TRINITY TEEN SOLUTIONS, INC., a
Wyoming Corporation;**

Plaintiff,

-vs-

**CLAIRE MALONE MATSON, CHANEL
PLANDER, and MOLLIE NICOLE
LYNCH,**

Defendants.

PATRA LINDENTHAL
Clerk of District Court

FILED **MAR 17 2016**
by Chanel Boone
Deputy

COMPLAINT AND JURY DEMAND

COMES NOW the Plaintiff Trinity Teen Solutions, Inc., by and through S. Joseph Darrah, and files its Complaint against Defendants as follows:

Facts Common to All Claims

1. Plaintiff Trinity Teen Solutions, Inc. (TTS) is a Wyoming corporation which operates a Wyoming State Licensed Residential Treatment Center legally authorized to provide behavioral and mental health services in Park County, Wyoming.
2. TTS customers are parents of troubled teens who are generally fairly devout Christians, primarily of the Catholic faith. Trinity therefore, markets itself as having those values, functions and focus as a basis for its service.
3. TTS has provided successful Christian faith-based therapy to young ladies for 14 years. Trinity's treatment model is God-based and its clientele generally focus on

Christian based treatment facilities and Christian values when seeking services for their troubled teens.

4. Plaintiff's clientele come from all over the United States, and Plaintiff's primary referral source and source of contact is the World Wide Web.
5. Plaintiff's primary advertisement medium for its business is the World Wide Web.
6. Plaintiff has enjoyed a relationship with past clientele and medical providers who have referred potential customers of Plaintiff.
7. Plaintiff also has and continues to receive referrals from clergy or religious groups from across the country.
8. The potential customers of Plaintiff rely heavily upon the World Wide Web for reviews and recommendations when those potential customers research appropriate placement in a residential treatment facility for their at-risk child.
9. The events which give rise to this Complaint predominately took place in Park County, Wyoming and everywhere that Defendants published their slanderous statements repeatedly over the World-Wide web as alleged herein. The false statements made by Defendants as alleged herein, were directed at operations in Wyoming.
10. The amount in controversy exceeds \$50,000.00.
11. Venue in this Court is proper, as the Defendants reside out of state and the events which give rise to this claim were directed at Park County, the harm occurred in Park County, and the events arose in part in Park County, Wyoming.

12. Defendant Matson is a resident of Florida and was formerly a resident of TTS. Defendant Matson also goes by the name "Malone M."
13. Defendant Plander is a resident of Thousand Oaks, California and was formerly a resident of TTS. Defendant Plander also goes by the name of "Chanel Plander" or "Chanel P."
14. Defendant Lynch is a resident of Milton, Florida and was formerly a resident of TTS for a period of several months. Defendant Lynch also goes by "Mollie L."
15. Defendant Matson has made it her mission to disparage and discredit the business and reputation of TTS through the publishing and re-publishing of knowingly false and defamatory statements about TTS which are intended to cause great harm. Said statements on the World Wide Web include but are not limited to the following:
 - a. Placing a *Google Review* on the World-Wide Web containing the false statements expressed by Matson a true and accurate copy of which is attached hereto as Exhibit "1";
 - b. E-mailing another person by making false and defamatory statements contained in Exhibit "2", a true and accurate copy of which is attached hereto;
 - c. On or about March 4, 2016, Plaintiff discovered that Matson created a Facebook Group page called "Trinity Teen Solutions" whose goal is to destroy and malign TTS.
 - d. Attached hereto as Exhibit "3" is a Yelp Review of TTS. The Review was printed off of the World Wide Web on March 14, 2016. The review by

"Malone M" is published by Matson and its content is blatantly false.

16. Defendant Plander has also made it her mission to disparage TTS with wildly false statements and innuendos which Plander knows are false. Plander likewise is involved in the Trinity Teen Solutions Facebook page which Plaintiff believes Matson created to recruit others in her mission to destroy TTS and its business.
17. The use of the Trinity Teen Solutions name by Matson has been without permission of Plaintiff, and has been used by Matson to mislead the public into believing that it is associated with TTS and its legitimate business to which Matson has no part.
18. Plander knowingly made the following false and derogatory statements about TTS:
 - a. On or the TTS Yelp Review Web page printed on March 14, 2016, Plander made false statements contained in Exhibit 3 under the name "Michelle P";
 - b. On February 10, 2016, Plander posted a false review on the Better Business Bureau Web Site. Said review is contained in Exhibit 4 attached hereto;
 - c. On March 3, 2016, Plander posted another false review which is contained in Exhibit "5" which is attached hereto.
19. Attached hereto as Exhibit "6" is a positive testimonial written and posted by Plander under the moniker of C.P. Thousand Oaks, California" as "Testimonial 5" before any of the negative posts she has made. Said post is absolutely contrary to the negative posts that Planders now repeatedly has made on the World Wide Web.
20. Defendant Lynch has done the following in an effort to destroy TTS:
 - a. It is Plaintiff's contention that Lynch has been instrumental in promoting a

web site on the World Wide Web called "Trinity Teen Solutions Survivors".

On the web site, the web site owner has infringed upon Plaintiff's trade mark and trade dress in a deceiving manner because she has placed the TTS logo on that web page, leading the viewing public to falsely believe the site is associated with TTS. A true and accurate copy of said page is attached hereto as Exhibit "7".

- b. On or about June 10, 2015, Lynch posted a lengthy letter containing significant and knowingly false statements on the so-called "Trinity Teen Solutions Survivor's Web Site" she entitled "Mollie's Story." Said post is attached hereto as Exhibit "8". The statements made by Lynch were false and Lynch was aware they were false because she was previously a resident of Trinity Teen Solutions and should have known they were untrue.
- c. On or about February 9, 2016, Lynch posted a false Yelp Review on the World Wide Web. Said review is posted under the pseudonym of "Mollie L." Said review is attached hereto as Exhibit "9". Lynch's latest review was only re-posted on that date because her previous Yelp Review of TTS, which was also profoundly false, was removed by Yelp as being inappropriate as a violation of Yelp's terms of service.

- 21. The statements made by Lynch recently are inconsistent and contrary to a review post she placed on the World Wide Web on October 12, 2012 actually praising TTS for the services she received. A true and accurate copy of said post is attached hereto as

Exhibit 10. In that very positive post, Lynch goes by the monicker of "Mollie L." The post demonstrates the knowing falsity of the recent posts by Lynch which are the subject matter of this suit.

22. Notwithstanding the praise given by Lynch in the past, Lynch has recently been working actively to destroy Plaintiff and its business relations in an effort to dissuade potential customers away from using Plaintiff's business.
23. The Defendants appear to have conspired and worked together in a concerted effort to destroy Plaintiff's business and to recruit others to their misguided cause. Attached hereto as Exhibit "11" is an example of such relationship of the Defendants on Yelp, whereby they show that the Defendants are "friends" with the other.
24. The actions of Defendants as aforesaid were intentional, wanton and malicious and were done with the specific intent of harming Plaintiff and adversely affecting Plaintiff's business relationships.

First Claim for Relief: Libel Per Se

25. Plaintiff incorporates by reference all previous allegations as if alleged herein.
26. Defendants, and each of them, have taken an active part in the initiation, continuation of knowingly false publications regarding Plaintiff, its owners, its services, employees and business.
27. The repeated false publications alleged herein were made concerning the Plaintiff, were intended to be made so, and were understood by those who read the publications.

28. All false publications made by Defendants disparaged the owners, accommodations, services and employees of Plaintiff, leaving the false impressions that Plaintiff's business is and was an unsafe and potentially dangerous place for vulnerable teens to be treated in an abusive and inhumane manner.
29. The false publications were made in order to dissuade potential customers with deep Christian values to believe that TTS was far from being a treatment facility which based its treatment on Christian based values, principles and methods.
30. The publications were intended to target potential customers which primarily were and are parents of troubled teens searching for residential treatment facilities for their children at a time when they are desperate to seek such help to save the life of their child.
31. Defendants' individual and collective false statements and conduct, as described in this Complaint constitute and attack on Plaintiff's corporate reputation and good will. These statements:
 - a. Demean Plaintiff's competence as a residential treatment facility for adolescents;
 - b. Disparage Plaintiff's integrity as a Christian faith-based facility because they falsely express and impute a callous disregard for the treatment and welfare of vulnerable juvenile patients, in-humane treatment of patients, and a program which is totally contrary to the values and treatment protocols of any reasonable residential youth treatment facility;

c. Were intended to, do, and have been interpreted by the receivers as, implying dishonesty, non-Christian values, and abusive conduct in Plaintiff's business affairs.

32. Defendants' individual and collective false publications as alleged herein were made without reasonable grounds for believing the truth as the Defendants themselves were residents of TTS and were well aware that their statements lacked any basis in fact.

33. The Defendant's false and repeated publications were made for a reason other than to protect the interest of prospective patients of Plaintiff, (being the target audience for such publications), in that the false statements were made for the purpose of persuading Plaintiff's potential customers to use other residential treatment facilities, or to not use residential treatment facilities at all.

34. The Defendants' statements, either collectively or individually, constitute libel per se in that such statements tend to hold Plaintiff up to hatred, contempt, ridicule and scorn in its business and in the Christian community.

35. As a consequence of Defendants repeatedly published false statements, Plaintiff has suffered:

- a. Loss of business;
- b. Loss of good will;
- c. Loss of customers;
- d. Damages related to the amount of time that Plaintiff and its staff members are required to field inquiries and to attempt to correct the concerns and related

inquiries raised by Parents whose children are considering utilizing the residential treatment services but have reservations as a result of the false statements made by Defendants;

e. Loss of time attempting to eliminate or have the negative false statements pulled from the World Wide Web;

f. The republication of the false statements every time a parent is researching a residential treatment center placement for their child.

36. Plaintiff has suffered pecuniary losses, unnecessary expense, shame and humiliation, loss of reputation, loss of business, loss of good will, unnecessary attorneys fees and expenses and a loss of its time which will be proven at trial.

37. Defendants' individual and collective acts will cause Plaintiff to be irreparably injured in an amount as of yet unascertained unless Defendants, and each of them are restrained from posting false information, are required to remove all false and disparaging posts they have made or will continue to make on the World Wide Web, and to cease in contacting past, present and future employees and customers of TTS either via the internet, e-mail, social media or other electronic means.

38. Because the conduct of Defendants was intentional, outrageous and in reckless disregard for the rights of Plaintiff, exemplary damages should be awarded in an amount to deter such future conduct and to protect society from Defendants.

Second Claim for Relief: Interference with Prospective Economic Advantage

39. Plaintiff incorporates by reference all previous allegations as if alleged herein.

40. Plaintiff has an ongoing business relationship with past, present and former customers of Plaintiff, faith based organizations, and medical providers who have referred potential patients to Plaintiff.
41. Plaintiff has a prospective economic relationship with customers who use the World Wide Web to research appropriate placement for their troubled adolescent children in a time when the need for such services are very great.
42. The potential customers of Plaintiff rely heavily upon the World Wide Web for reviews and recommendations when those potential customers research appropriate placement in a residential treatment facility for their troubled child.
43. By issuing and publishing the false statements on the World Wide Web as alleged herein to all potential customers and referral sources of Plaintiff in the United States, Defendants collectively and individually have intentionally interfered with Plaintiff's ongoing business relationships and prospective economic advantage with the specific knowledge and intent that making such false statements would destroy those relationships and prospective advantage.
44. Defendants, through their published statements, have intentionally and wrongfully induced customers and potential customers from seeking the services that Plaintiff provides to teens and have prevented the attainment of prospective economic advantage.
45. Plaintiff was and is continuing to be damaged and suffered a disrupted expectancy as a direct result of Defendants' actions and misconduct.

46. In making the false statements and engaging in the misconduct as alleged herein, Defendants individually and collectively acted wrongfully and with malice, oppression, and in conscious disregard of the right of Plaintiff and with knowledge that the statements were false.
47. In communicating the egregious and false statements as alleged herein, Defendants were not attempting to protect any legitimate economic or other interest they have or did have, as their singular goal has been the destruction of TTS business relationships.
48. As a result of Defendant's misconduct, Plaintiff has suffered considerable loss of business relationships, good will, and future business relationships.
49. Because the conduct of Defendants was intentional, outrageous and in reckless disregard for the rights of Plaintiff, exemplary damages should be awarded in an amount to deter such future conduct and to protect society from Defendants.

Third Claim for Relief: Civil Conspiracy

50. Plaintiff incorporates by reference all previous allegations as if alleged herein.
51. Defendants have unlawfully conspired to develop a plan to wrongfully cause the parents of troubled teens to look elsewhere for residential treatment facilities as alleged above.
52. Defendants have perpetrated a plan to use the World Wide Web as an illegitimate means to individually and collectively post false and seriously demeaning statements on various web sites, and social media, including a closed group page on Facebook whereby they have likewise misappropriated the Trinity Teen Solutions name and

logo.

53. Defendants have intended to use the World Wide Web for an illegitimate purpose with the ultimate goal of causing Plaintiff great harm as a result of potential customers being dissuaded from utilizing the services of Plaintiff.
54. Defendants' individual and collective statements were and are knowingly false and do not come close to meeting the definition of protected speech or expression.
55. Plaintiff has suffered pecuniary losses, unnecessary expense, shame and humiliation, loss of reputation, loss of business, loss of good will, unnecessary attorneys fees and expenses and a loss of its time and expense which will be proven at trial.
56. Because the conduct of Defendants was intentional, outrageous and in reckless disregard for the rights of Plaintiff, exemplary damages should be awarded in an amount to deter such future conduct and to protect society from Defendants.

WHEREFORE, Plaintiff demands Judgments against Defendants, jointly and severally as follows:

- a. For Compensatory damages;
- b. For pecuniary losses, including lost time, loss of business, loss of good will, expenses related to addressing the false statements, travel expenses, attorneys fees, expenses and costs;
- c. For attorneys fees, cost and expenses as may be allowed and associated with the claims alleged herein;
- d. For exemplary damages, including attorneys fees and costs;

- e. For affirmative relief which mandates that Defendants or anyone acting on the behalf of Defendants be required to remove any false and/or defamatory statements about Plaintiff, its owners, employees and/or services as published on the World Wide Web, social media, electronic means or otherwise, and to periodically report and demonstrate compliance of the same to the Court.
- f. For affirmative relief which enjoins Defendants or any third party acting on behalf of Defendants from posting false and defamatory statements on the World-Wide web, social media, and other electronic means of or concerning Plaintiff, its owners, employees, accommodations and services.
- g. For affirmative relief which enjoins Defendants or any third party acting on behalf of Defendant from communicating with past or future patients or patient families of TTS in a false or defamatory manner regarding TTS, its employees, owners, accommodations or services through the World Wide Web, Social media or other electronic means and to periodically report compliance with the Court.
- h. For any other relief the Court deems just and equitable in the premises.

DARRAH LAW OFFICE, P.C.

By 

S. Joseph Darrah, WSB#6-2786
Attorney for Plaintiff
254 E. 2nd Street
Powell, WY 82435
(307)754-2254

STATE OF WYOMING) SS
COUNTY OF PARK)

I certify that the foregoing is a true
copy of the original on file in this office.

Dated APR 28 2016

PATRA LINDENTHAL
Clerk of District Court

By 
Deputy

Google Reviews



Write a review

4.3

9 reviews

Sort by:

Most helpful

Michelle Smith

2 weeks ago

None of my real problems were addressed. I was told I do not have a disorder. Turns out I have autism, and have real problems communicating with other people. I was there for almost two years and did not learn how to communicate better with other people. The reasons I was sent there boiled down to breakdowns in communication with my family. I endured food deprivation, and sleep deprivation. I suffered mental and emotional abuse. Usually, I had no idea why we were in trouble if the entire group was punished for something. IF you want to help your child, I recommend finding a short-term facility or placing them in the juvenile justice system. Studies show no difference in outcomes between patients of long-term treatment facilities and those placed in the justice system. At least in the justice system, facilities have to follow basic human rights such as regular sleep hours and meals. Also, there is a definite sentence. A person's behavior while inside determines if their stay will be shorter or longer. If a person wishes to be out sooner, they will change their behavior. Also, they will not be forced to sleep on a floor, have humiliating interventions (such as carrying around a rock-filled backpack) or be told "we can keep you here as long as we need to." I was also held against my will for over a year after I turned 18. I was told I couldn't leave. The facility told my parents I had chosen to stay. I did not. At no time was I shown paperwork, such as a court order, that stated the facility could hold me against my will. Years later, I am still in therapy for PTSD due to when I went through there, and am learning how to deal with life and other humans despite my disability. Do not give this place your business. Also, notice how so many of the positive reviews are from parents? And what other former "clients" have to say about the place?

Arnold Barnette

a month ago

I sent my daughter to Trinity several years ago. She was there over a year and it was the best thing that happened to her and my family. I learned a lot as a parent during her treatment. Trinity helped my wife and I become better as parents to help my daughter become the amazing person she is today. She got caught up in the wrong crowd like most teenagers can find themselves easily doing. She quickly became out of control and was dabbling into drugs and running away and was slipping up in her school work along. The biggest thing for me as a parent was that I wanted my daughter to be safe and get the treatment she needed. We tried several other treatment programs and none of them were effective. Trinity is so unique and the treatment they used really helped my daughter get over her traumas along with get her life back on track along with give her life skills in order to become successful after treatment and to become better in the real world. The staff there are very professional and made the small treatment program to be a extension of my family along with give her the therapy needed. I'm so thankful that there was a good alternative and a place to help my daughter and my family. I would highly recommend Trinity. I don't know where my daughter would be today if it wasn't for the treatment they provided. It's nice that Trinity is so small and they could give my family and daughter the individual attention we needed. I still keep in contact with Trinity and the staff there and occasionally go back and visit with my family and let my daughter remember see the place that

had such a big impact on her life. Along with seeher favorite horse at the ranch Precious, and her favorite dog Faustina.



Malone Matson

5 months ago

As a graduate of TTS, I strongly advise parents DO NOT SEND YOUR DAUGHTER HERE. The staff are highly unprofessional (Look at the employment section of their website: "no experience necessary"). Almost every girl I have spoken with who has left TTS has had to get treatment for PTSD, myself included. The staff say they "love" us but it's the kind of "love" people have for each other in a cult. The staff may be nice people but the program at trinity sends them on a power trip and they become quite sadistic. We were abused both mentally and physically. No they did not hit us, but they made us- teenage girls!- do obscene amounts of manual labor and exercise. They would leave us outside in below 0 degree weather for long periods of time. Made us do ranch work in windstorms over 100 miles an hour. Sometimes they deprived us of sleep until it felt like we were losing our minds. I was almost always hungry but they used food to control us. Mentally, they used humiliation as "therapy". If you look up federal guidelines for these kinds of programs, I can see numerous ways in which Trinity violated our civil rights but there is no federal oversight in WY! TTS brainwashes parents. They scare them into thinking their daughter will die if they don't send her to/keep her at Trinity. Our only communication with parents was through letters which the staff would make us rewrite over and over again until they only said great things like "we love you and miss you and are so happy to be here!" and parents believe it! So they think oh trinity is so great! And their daughters come home and they are SCARED TO DEATH of being sent back so they behave really well but really they are miserable inside and eventually they almost all break because none of us received good therapy, just more trauma. So parents actually believe trinity is great and they stay in denial because they can't admit that they RUINED themselves financially only to have sent their child to a terrible place. It is still hard for me to forgive my parents, even 10 years later. I will always hate them a little inside. Be wary of these positive reviews on here: girls tend to "love" trinity when they first leave but in a year or two the haze of the brainwashing clears and they realize it wasn't so great... Here are some examples from my stay:

- we had to watch each other pee and poop into a bucket anytime we needed to use the bathroom. If a staff didn't "feel" like taking us to the bathroom we had to hold it. Some girls wet their pants, some got yeast infections. The staff would email our parents and lie to them saying the daughter refused to take care of herself.
- we cleaned up animal poop every single day but we only had two pairs of pants and we only got to take showers ONCE a week for 7 minutes.
- If we had injuries, they never believed us. I had excruciating knee pain but the staff didn't trust me. They thought I was lying to get out of all the constant running and pushups and jumping jacks they made us do. 10 years later my knees still hurt whenever I exercise.
- they put some girls on "solo" in a tent by themselves up the hill. They gave her a cooler with bread, cans of tuna, raw carrots, and beans that they had to live off of for a week. The girl had no contact with anybody for weeks and months at a time. Trinity eventually got in trouble for this because isolation is illegal. Now they use the "chair". They make a girl carry a folding chair around with her. Everywhere she goes she has to sit in it facing away from the group and no one is allowed to talk to her.
- They made girls wear hiking backpacks full of rocks which represented the burdens that girl places on others (talk about mental AND physical abuse!) The girl had to wear it everywhere even while working or running. One girl had to wear hers on front so we couldn't see her face FOR A YEAR!
- They lied to us about our friends and family and made our parents write mean letters to us so that we thought no one in the world loved us except trinity.

I'm out of space but there is so much more. Message me.



Mark Sampson

7 months ago

Trinity Teen is a fantastic boarding school for troubled teen girls. With an emphasis on Christianity, their therapeutic program will instill basic and fundamental principles of love, service, and a dependency on God.

Their staff is professional and highly qualified to assist any struggling teen girl with problems ranging from addiction and eating disorders to failing academics. I highly recommend!



Kelly Barnette

7 months ago

If it wasn't for Trinity i would still be lost in life. I still would be doing terrible things. Trinity helped me restore my lost relationship with my parents. The treatment i received there helped me learn so many different aspect's of life. I am now graduated from college and enjoying my career. Thank you Trinity for saving my life and forming me into the person i am today.



Kelsay Lang

3 years ago

I went to Trinity for 3 years and it has changed my life for the better. I never thought anything I was learning there would really help me, but it has, and I see it in my everyday life.

I am so thankful my parents sent me here and were able to provide for me to be able to go all the way through the program and graduate. I went through a lot in my childhood, hurt many people in my teen years, and had a broken family life. I also found out some family matters while i was at TTS. With the the help of the Staff and therapists, I was able to learn all that i needed to learn to be able to live in the real world, a good and fruitful life.

I understand what it is like to feel like there is no hope or no one there for you, TTS really showed me that they take the time to focus on ME and work with ME on MY issues. I was truly heading down the wrong path and i truly believed that Trinity saved my life. I have never felt so much love from people who truly want to help me see my true value as a person. I know many of you may be thinking, wow, this Kelsay girl must be an angel now! Well, this is not true at all. I am no angel. Trinity didnt make me a perfect person, it made me a better person, someone who now knows how to deal with my temptations in a healthy way and look for a better alternative. I make mistakes daily and battle with constant struggles. I truly believe Trinity girls are some of the strongest girls there are. We know exactly what our struggles are, our temptations, the difference is, we know how to handle it in a healthy way. We are held to a higher standard because we have been taught.

All in all, i would just like to say, Trinity was the best thing that has ever happened to me in my life, and definitely the hardest thing i have ever done in my life so far. I am truly thankful for all of the Staff, Therapists, and Angie and Jerry for the opportunities they give girls for another chance at life. Trinity is always in my prayers.

God Bless



SSAUHE 7645

3 years ago

I also attended Trinity with the young female below (Kelsay Lang) for two years. We both have been able to see each other grow, along with many other females. I was a violent individual, malicious, spiteful, sadistic... the list could go on. I was involved in many things that would have hindered my dreams or just flat out destroyed them if it was not for TTS and my parents. My dream was to be in the military. I am now in the USAF (active duty), getting ready to deploy, going to school, and getting my Officer Package ready for the Marine Corps. Even though I am low in the ranks, I have received many acknowledgements for my hard work and positive attitude, even in the event of the death of my daughter. If it was not for TTS I would not have been able to self-identify later on down the road of my alcoholism. I saved my career and TTS gave me the tools to do so. Life is not perfect after TTS, its much more difficult, but my zest for life makes all the difference. I am proud to say I went there. When I'm working with the marine or army unit I'm stationed with I sometimes wish I was back in Wyoming shoveling lamb feces. It was a simple time, it was a difficult time, but it was a beautiful time. God Bless. Thank you TTS for everything.



David Grosch

3 years ago

Our daughter was seriously abused both in her birth home and in the foster system before we adopted her. We believed that her anger would abate over time but found we were in way over our heads. After some in-treatment facilities were tried (one for 13 months) and she was still violent, disrespectful and dishonest among other behaviors, and so we put her in a secular therapeutic boarding school. It was really a case of inmates training inmates. She stayed defiant and managed to get involved in Wicca. After that place went bankrupt, we found Trinity. What a difference from the other centers she had been in. She finally had the stability and lack of distractions (such as boys, internet, etc.) she needed to focus on her issues. The staff was firm and loving and she soon found out that her old tricks didn't work any more. The equine therapy and the EMDR used there seem to be a highly effective therapeutic combination. That along with the loving, safe, but tough environment she is working wonderfully for her. After a while she quit fighting and started healing. We highly recommend Trinity for anyone who is looking for that type of help.



Dan Grelinger

3 years ago

My daughter was exhibiting multiple self-destructive behaviors, and no matter how much we did or how hard we tried, she would not allow us or anyone else to help her here at home. After reaching the difficult decision that we needed much more help than we could get from local counselors, I extensively researched possible solutions for her on the internet, and Trinity Teen Solutions was the only one that I found that met all of our needs. TTS offered our daughter a safe place in which to focus on herself, her behavior, and the damage that it was causing to her and to her family. Trinity offered the following very important things that we and our daughter needed:

1. A safe, secure location where the staff were able to remove the distractions and temptations of the world that our daughter would surround herself with in order to prevent herself from focusing on her own growth and maturity (cell phones, texting, pop/rap music, television, inappropriate movies).
2. A girls-only environment, one in which the girls are treated and expected to treat others respectfully, without focusing on being popular, how they looked, or one in which boys were around to compete for attention.
3. A truly God-centered environment. Trinity's program walks the talk, that God is truly the center of our universe and the reason for our being. Especially comforting was the seriousness in which the staff approached Christian holidays with observances and activities.
4. An accredited educational program so that our daughter could maintain progress towards her eventual high school graduation. The program that Trinity used was accepted by our daughters High School towards her eventual

graduation.

Our daughter spent over 15 months at Trinity and is home now. She is not perfect and still struggles with her challenges, but during her time at Trinity we knew that she was being kept safe and was progressing better than in any other environment we could provide for her.

Yelp Reviews

Kyle Woodward

From: Angie Woodward
Sent: Tuesday, December 01, 2015 2:15 PM
To: Kyle Woodward
Subject: FW: TTS
Attachments: TTS complaints.doc

From: Mike Stallings [mailto:mds1958@gmail.com]
Sent: Tuesday, July 10, 2012 8:13 PM
To: Angie@trinityteensolutions.com
Subject: Fwd: TTS

From: Aaron Dixon <adixon2@yahoo.com>
Date: July 8, 2012 2:19:02 PM EDT
To: Mike Stallings <mds1958@gmail.com>
Subject: Fw: TTS
Reply-To: Aaron Dixon <adixon2@yahoo.com>

----- Forwarded Message -----

From: Tudor Dixon <tdixon@michigansteel.com>
To: "adixon2@yahoo.com" <adixon2@yahoo.com>
Sent: Sunday, July 8, 2012 2:18 PM
Subject: FW: TTS

On Jul 6, 2012, at 10:08 PM, Malone Matson <malmatson@gmail.com> wrote:

Tudor,

I don't want to scare you but you are right to worry. Trinity is a terrible place and it caused me a lot of trauma that has taken/is taking a long time to heal from.

First of all, here is a great site. <http://astartforteens.org/> They are spot on.

If your sister's parents sent her there I can only imagine that they feel one of two ways: they were sick of your sister-in-law and wanted to get rid of her (it's sad but this is why so many innocent girls are sent away) OR they were really really scared and felt they had no other option. If the former is true, I don't know what you can do. You might be able to contact child services in Wyoming and tell them about what is happening. I tried this once about a year ago. They did an investigation and said everything was ok and made a few changes. I doubt they did a thorough investigation.



If it is the latter, then you need to make her parents understand that places like Trinity thrive off of parent's fears. They will tell them, "If you don't do this and that, your daughter will do drugs or kill herself!" or whatever. They make it seem like there is no other option. They lie and tell the parents it will only be a few months and then once they send their kids there, they scare them into keeping them there. All the while they are raking in the cash.

Here's somethings you should know about Trinity:

-When I was there, all of our letters we wrote home were censored. The staff made us rewrite them over and over until they didnt say anything bad in them and then they would send them to our parents. My parents did not receive a single honest letter from me.

-Trinity does not tell parents to what extent they use physical exercise as punishment. It is extreme. When I went there EVERY girl stopped getting her period for over a year each because our bodies were put into so much shock. Many girls lost a lot of weight. We were exhausted and some nights we only got 4 hours of sleep and then we'd have to do manual labor all day, run several miles, and do pushups, wall sits, etc as punishments throughout the day for all of our mistakes.

-I was hungry for a year and a half of my life. I developed an eating disorder after being at Trinity. I weighed 100 pounds when I was 20 and I am 5'11". I didnt start gaining weight until i finally realized that I deserve food.

-Constant humiliation is a given. The "chair" is an example of this. The staff will tell girls that they "love" them and then taunt them about all of their short comings, laugh in their face, make the girls laugh at them, and give girls embarrassing "interventions" to remind them of their weaknesses. One girl had to wear boards around her neck that said "Like the fool repeats its folly, so the dog returns to its vomit."

-None of the people who work there are professionals in ANY capacity. Angie, the owner, has training as a nurse. Thats it. Jerry used to be a cop. All of the staff who are spending everyday with your sister have undergraduate educations AT BEST. One of the advisors while i was there was 19. She was Angie's niece, that's why she got to work there. She was a complete idiot and was cruel.

-Your sister has probably been pretty brainwashed at this point. She will recover from it but this is important to know because if her parents asked her if she wanted to come home she might be so scared that she'd say no.

-I didn't learn anything in school. It is a lie when they advertise themselves as a boarding school. Your sister will most likely be very behind in her education.

This is no way to deal with feelings of abandonment. It will only make them worse. The chair is a form of isolation. It is meant to crush her spirit so she will stop resisting and conform completely to what Trinity wants her to be, which is a mindless Catholic zombie. The staff have probably predetermined what your sister's "problems" are and they are probably wrong (this is the case for all girls because the staff never allowed us to consider our parents as being at fault in any way. Everything was our fault, not our parents, i.e. the people paying for the program.) Because they are probably wrong, your sister is probably having a hard time correcting those "problems" and so the staff feel they need to break her even further. Its an endless cycle that will keep going as long as her parents are willing to give them money. These people are so stupid and ruthless. I hate them.

Please convince her parents to bring your sister home. It is not too late to heal the damage done. When your sister does come home, please make her understand that her family did

not know what was really happening at Trinity. I thought, while I was there, that my parents knew that I was being tortured and that they were happy about it and thought I deserved it. It crushed me. Reality is, they never knew about all the horrible things Trinity did to us, they only heard lies.

This is very serious but I don't want to frighten you. Most girls, after a few years, turn out ok. I am lucky that I have been very successful in life since because (not to sound too arrogant) I am smart. But I did a lot of drugs and a lot of stupid stuff when I came back from TTS. I was way more depressed when I returned then when I left. My relationship with my family is only just now (7 years later) beginning to recover. I don't know of any girls who have committed suicide after Trinity (though there are a few who I cannot find and have not heard from so who knows.) More than half the girls I went to TTS with had babies before they turned 21. Only I and one other girl I went with have graduated from college. TTS says on their website that they have a 99% success rate but it's more like 5%. It's funny, they have a letter on their site from parents of a girl I went to TTS with. It lauds Trinity for all the great things it did for their daughter. In reality, they kicked her out of the house a few weeks after she returned and they don't talk now. TTS lies to parents. I can't stress this more.

Anyway, we all had a hard time after we left but most everyone is sober and generally happy now. Or so it seems. I don't want to discourage you.

Talk to her parents, it's worth getting in a fight with them over it. Contact a lawyer. Contact Wyoming child services or child abuse programs in the state. Finally, be prepared to be completely supportive of your sister when she comes back. Everyone in my family was pro-sending me away except one aunt. She made it clear to me that she always thought it was a bad idea and even just having one person on my side made me feel better.

Please feel free to ask me anything else. You can call me too 305 877 0340. I hope this is helpful. I'm so sorry.

<http://astartforteens.org/>

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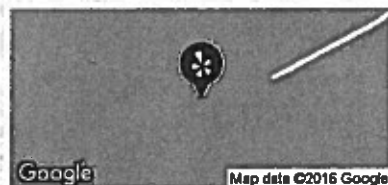
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Trinity Teen Solutions

8 reviews

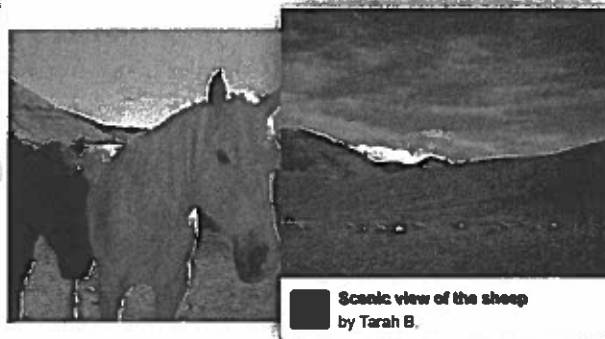
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Start your review of Trinity Teen Solutions.

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 Garry S.
Watertown, SD
7 friends
11 reviews

2/21/2014

1 check-in

I sent my daughter to Trinity Teen Solutions in search of a treatment center that would actually be effective on my daughter. All the treatments before this were not effective, and didn't make matters any better. My daughter was going off the deep end on a fast pace with me and my wife both busy with our careers we didn't realize what our daughter was up to until it was too late. Like most teenagers she wanted attention and was going out of her way to get it. She was sexually active and was in to drugs at a very young and disturbing age. After she was constantly in trouble at school we had to take action. It was tearing my marriage apart and until we found Trinity we thought there was no hope and we were going to lose our daughter. The staff at Trinity was very professional and really took time to care for my situation. The education was great and the counseling really helped my wife and I realize what was going on and what we needed to do as a family to save my daughter. My daughter truly believes that the treatment at Trinity saved her life and her soul. My daughter will be graduating college with honors this spring. She already has a job lined up starting this summer. I thank Trinity for their help in saving my daughter and keeping my family together after all the years of stress and heartbreaks it has finally paid off and I cannot say enough about how thankful I am for Trinity and what they have done for my family.

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 Chanel P.
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"trinity teen solutions"





Comment from Angie W. of Trinity Teen Solutions
Business Owner

6/17/2015 · Thanks Garry for the positive review, hope all is still going good and hope to see you guys soon to...
[Read more](#)



Kelsie V.
Fort Collins, CO
79 friends
1 review

★★★★★ 2/14/2016

I attended Trinity as a teen and have since tried to forget the trauma that happened to me while I was there but have found myself 5 years later, still tortured by the memories. I was your typical rebellious teen- experimenting with alcohol and drugs, defiant, hanging out with older boys, and depressed. However, the punishment I received at trinity for being this way is something I would never wish on my worst enemy. All Trinity did was confuse and lie to my family, and further traumatize me. I was sitting in a car one day after I got out drinking and smoking weed with my old friends 100 times MORE self destructive, alone, and sad than I was the day I went to Trinity. The affects of Trinity led me to be a serious hard drug abuser, something I was never destined to be coming from my loving and supporting family that was only trying to help me. I had no other way to numb the memories and pain. Every other girl I attended with had similar fates- either became serious junkies, or became promiscuous and had children out of wedlock because they were only searching for love and to numb the memories as well. I am being totally honest when I say this- I WOULD HAVE RATHER BEEN IN JAIL.

Why? Many reasons. One, in jail you actually know how long you are going to be there. Trinity is on a "need to know basis." So unless it is information you need to know in a life or death situation, it is withheld from you. The MONTHS never knowing when you will be able to see your family again or be treated like a human being are torture. Two, you can talk to other people in jail and rely on each other for support. At Trinity, the girls are not in any case allowed to be friends or talk to each other without permission. No one is allowed to know why the other one is there. Theyre encouraged to tattle on each other and punished if they do not. This creates a lonely and depressing environment versus having other girls there for support and to share similar struggles with. Three, if you are doing well you will get out sooner and vice versa. At Trinity, no matter what you do, you will be accused of faking it and lying and problems will be made up by staff for you, anything in order to tell your parents you need to be kept there longer. It is biased and decided by unqualified "life coaches" that have simply received an undergrad degree in something like psychology and has no training. I was once told by one of these staff members that I was getting too close with another girl and every time I looked or spoke to this other girl I was tacking on a few months to my stay at Trinity. My final reason is you are given adequate hygiene, food, and clothing in jail. At Trinity, every girl there even though we were all different sizes and body builds were FORCED to eat the exact same portion every single meal and if they didn't eat something on their plate? Punished. This was too much for some girls and never enough for others. Showers were maybe once a week in cold water for 5 minutes. And the underwear, bras, and clothing were reused by girls for over 20 years- it was ratty and disgusting. One girl came back as a staff member 10 years after she had been there and said she recognized her sweat pants and hoodies she wore at age 15. This is pretty amusing to me since TRINITY COSTS NEARLY \$300 A DAY. Yet they spent none of this money on clothing or anything else really. Food was ordered cheaply in bulk and the girls made every thing themselves- low cost pasta and rice meals- and if anything started getting used to much and became "too expensive" it was immediately nixed. I was once reprimanded for using the too expensive avocados.

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"trinity teen solutions"

Angie Woodward, the owner. How that name makes me cringe. She is the lovely lady responsible for harming so many teen girls and scamming hundreds of people into dumping her loads of cash for her multiple homes, vacations, and boats, cars, horses, ATVs, etc. that she parades around the girls and rubs in their faces while they are slaving away on her ranch. Angie's father owns the trouble teen boys ranch down the road and is where she learned all of these shaming and fear tactics for the clients and families. The only difference between the two ranches is that the boys one has been closed for abuse, neglect, and fraud, while Angie's is surprisingly still open! She claims to have years of experience and be our on staff nurse but I think I only saw her twice in the whole year and a half I was there- like I said she was busy vacationing. She hires 24 years olds fresh out of undergrad to carry out the dirty work instead who are too fresh in the world and naive to know they are doing something wrong- although a few figured it out and left and have written reviews here themselves that are negative but have been removed. Ill spare you the details of the abuse and neglect that goes on at Trinity- all you need to know is it is a scam with false advertising, AND YOU SHOULD NEVER SEND YOUR DAUGHTER HERE.



Anna A.
Austin, TX
48 friends
2 reviews

☆☆☆☆ 2/13/2016

I attended Trinity back in 2012. Not only was this place not at all what they said they were but it caused more harm than good to the girls that went there. My parents realized what a scam it was after much manipulation from the owners and they removed me from this place as fast as they could. I was diagnosed with PTSD from being there by my therapist when I returned home. After thousands spent on therapy to help me overcome these traumas I can say in confidence DO NOT send your children to Trinity. Please consider other programs. My parents were just trying to find a place of healing for me but were horrified to find out how damaging it was instead.



Mollie L.
Milton, FL
5 friends
5 reviews

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"trinity teen solutions"

★★★★★ 2/9/2016

My previous, detailed review of Trinity, was removed by Yelp because the content depicting my stay at Trinity was deemed "better suited for the authorities," on the day that my post got bumped to a "recommended review," status. (Hmm, wonder why that might be.) That being said- Trinity Teen Solutions is an ineffective, unregulated program that uses tactics of shaming, and bullying to tear down young girls and families during an already difficult time. The owners' of the program are running a scam, and advertise Trinity as a boarding school for troubled girls, with emphasis on animal therapy. There was no animal therapy. Their website touts a 98% success rate, but every girl I went there with now suffers PTSD, is into drugs or alcohol, or became pregnant out of wedlock in negative circumstances. In addition to all that, the majority of the girls who went there (if not all), now have severed ties with their families, because they cannot understand how traumatic the experience at Trinity was for us, as the business owners mislead parents throughout the entire treatment process. There are other treatment options that are safe, regulated by the government, and are much more suited to help a girl who is struggling. I am stronger today in spite of Trinity, not because of it. Also, several of the reviews on here, are from girls that do not exist. They have reviewed Trinity Teen Solutions on Facebook as well, and the profiles are clearly fake. Their only friends are the couple of other fake "attendees," who wrote fake reviews, and Kyle Woodward, one of the children of the family who owns the program. Funny enough, Kyle Woodward is also listed on the Trinity Teen Solutions website as being their "Media Expert." How interesting..



Samantha S.
Long Beach, CA
33 friends
3 reviews

★★★★★ 6/6/2015

I went to Trinity when I was 16 years old, and though I was deeply troubled, lost, destructive and in need of virtue and order in my life, Trinity took finding a solution to those issues to the EXTREME. Over my time there, a year and a half, I was tied to a goat for 4 months by a lead rope used for horses - forced to run in a blizzard in below freezing weather while carrying a bin full of raw, bloody meat, as a staff member rode in a four-wheeler next to me and screamed at me to go faster - deprived of letters from my parents, which I later found out were indeed sent to Trinity, but held from me, and STILL the staff told my parents that I received the letters. One of these lies came from my therapist herself in an email to my mom. Yes, we have that conversation saved, in addition to the one where my mom asked her why I had been put on probation, and she forgot to mention the part about her ambushing me with a male staff member there, and instead, told my mom that the probation was a common "test" they did to see how the girls could handle it emotionally. Yes, that too was a flat out lie.

In reality, I had been told by all of the staff and my therapist, that my probation was a result of my flirting with the old, heavily bearded, overweight male staff member who claimed that I was giving the impression that I wanted his affirmation about my body. Just typing those words brings tears to my eyes and makes me want to gag at the same time, because I hate reminding myself of the ridiculous, false accusation, that my therapist of over a YEAR was one of the ringleaders of. But no, I guess it would've looked too suspicious, had she been honest with my parents and told them the REAL reason was her accusation of their TEENAGE daughter, the one about her trying to impress this overweight, effeminate male staff member by "running faster" when I passed him on the group runs to chores, and that was about the only example they had, apparently, but it didn't matter, because their lies were always more powerful than the truth we were forced to hold inside of ourselves. This treatment drove some girls to attempt suicide.

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"trinity teen solutions"

But isn't it convenient that when they put me on probation, I'd just made it to level 3 on Trinity's level system (big deal there), the enrollment rate was at its lowest since I'd first arrived, and my parents had been known to be consistent with Trinity's outrageous payment plans. Payment plans which, as my parents grew suspicious, they proceeded to map out.

The conclusion? My parents had no idea where all of the excess money could possibly be going, considering we barely used electricity there, they knew how much the staff was being payed, cost of food etc. - so, what could it possibly be? Well, they were at a loss. Had they been at the ranch, they could have looked to all of the Woodward's new trucks, boats, off road vehicles and all of the other material goods we girls were painfully aware of and had to see everyday as we maintained the Woodward's entire ranch. How could they not feel guilt when they saw us picking rocks in their barren fields for 4-5 hours in the hot sun, to set up for when we would eventually do manual irrigation on them - even though all of the nearby irrigation systems at other ranches were automatic - but I guess those ranch owners didn't have a herd of "troubled teens" they could assign to do all of that heavy labor for them. I bet they also didn't have a herd of teens to tend to all of their sheep, horses, cows, pigs and the like - to spend hours on end everyday cleaning animal poop, picking ticks off their show ponies, walking their show sheep, etc.

I guess this harsh treatment didn't matter to them, since we were all treated like animals there. If they thought you were really bad, you got put on the "chair," which means you have to carry a folding chair with you everywhere you go, and when you're with the group, you have to sit facing away from them and cannot participate whatsoever. The girls on "chair" are not allowed to speak, and when I first arrived, the girl on chair was forced to sit behind the wood burning stove. Girls could be put on chair for months.

I never got the chair, but my other challenges were just as bad, if not worse. Could I tell my parents about the harsh, illegal treatment? Nope, because on your one and only 15 minute phone call you get each week, a staff member sits right in front of you with the phone to her ear, monitoring and typing everything that you say. Think I'm kidding? Think again. The one time I told my mom that I missed her on the phone, I couldn't help but cry, and then she began to cry. The next time I saw my therapist after that, she reprimanded me for my obvious "manipulation" during the phone call, and didn't fail to remind me that I could have my phone call privileges revoked, were I to keep up that behavior. I never said "I miss you" again after that.

The worst part? Arrived at 16, left at 18, and now I'm 21 yrs old with PTSD.



Comment from Angie W. of Trinity Teen Solutions
Business Owner

11/4/2015 - We are inspected and licensed by Wyoming Department Family Services (DFS) 4 times per year. DFS... Read more



Malone M.
Brooklyn, NY
14 friends
3 reviews

☆☆☆☆☆ 8/6/2013

This place is a scam. Ignore their false advertising on their website. Serious lack of professional staff. Abusive both mentally and physically. The word for this is "prisoner for profit". Angie, the owner, convinces parents that if they don't send their daughters to Trinity, they will DIE. Parents send their kids there and then the staff make them write letters to their parents telling their parents that they really did need help and they are happy to be there. They make

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"trinity teen solutions"

them confess secrets (some of which aren't true!) to their parents so their parents will believe Angie that their kids will DIE if they come home. Then Angie rakes in all the money and buys new cars, snow mobiles, boats, vacations all the time, etc. Meanwhile the girls are being forced to do excessive labor in extreme conditions with limited food. They are broken down mentally (and not in a good way). All girls who I went here with came home with PTSD. Most had children out of wedlocks, few went to college, a lot did drugs or drank (even if they didn't before coming to TTS). This program and programs like it are completely unregulated by the government. They exist in the far reaches of the wilderness where the kids cannot run away. The kids have no access to phone or internet. All letters parents receive have been reviewed and edited by staff. If your daughter goes here and tells you she loves it, that is because she was brainwashed or is terrified that you asking her if she loves it is a trick and if she says no she will be punished for months on end.

If you're a parent who wants to send their kid here- YOU are the problem, not your kid.



Kaitlyn T.
Aurora, CO
8 friends
7 reviews

★★★★★ 12/4/2013

I attended Trinity when I was a teen, and all I can say is that it saved my life. The staff were always there to help and guide me, and the owners Jerry and Angie were very involved and worked to make sure that all of the girls succeeded. Trinity not only helped me, but it also helped my family grow closer together. Thank you for everything Trinity!



Comment from Angie W. of Trinity Teen Solutions
Business Owner

6/17/2015 · Hey Kaitlyn, hope everything is going well, hope to hear from you soon!!! Trinity misses you and are... [Read more](#)



Chanel P.
Thousand Oaks, CA
18 friends
10 reviews

★★★★★ 6/21/2013

First to Review

I am editing my review because it has been awhile and Trinity's treatment is still negatively affecting my life five years later.
 For my opening note, if your plan with your daughter is to scare her into following orders and renouncing the toxic influences in her life there are much cheaper and humane ways you can go about this. I don't know the actual breakdown of what trinity charges but I do know the amount of, treatment and therapy I received in my three years there. I spent a little over a year on and off sitting in a corner staring at a wall with no therapy, little to no contact with family, no animal therapy and eating nothing but kidney beans and dry tuna.
 I did see these claimed regular inspections but do note that these inspectors are not talking to the girls and staff makes sure we do a thorough clean up on a moment's notice and of course the girls who are a problem are kept away from these inspections. All letters and phone calls to family are monitored. letters are handed back to be rewritten if they are not what staff wants. Trinity's staff is focused on making even more problems for the girls so that they will have to remain in the program longer than initially needed. They do this by pushing us to our limits physically, overworking us and giving outlandish physical consequences for wrongdoings such as putting our shoes on wrong or being too friendly with another girl. Girls are consequences simply for being upset which is something that will happen when you are homesick, hungry, tired, dirty, overworked and trying to work through tough emotional

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"trinity teen solutions"

problems.

I was 16 when I went to trinity and graduated the program at 20 years old. I suffered from depression, cutting, anorexia and was struggling with being gay in a catholic family. I needed help and guidance but more than anything I needed love and support from my family. I learned some good lessons from Trinity but at the cost of deep seeded abandonment, irrational fear and trust issues. Please, if you love your daughter and want what is best for her do not send her here.

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18 other reviews that are not currently recommended

From the business

Specialties

Catholic boarding school and therapeutic residential treatment facility for troubled teen girls.

History

Established in 2002.

Trinity Teen Solutions has helped 100's of teen girls in our Christian therapeutic boarding school and in 2010 we branched out to serve young women in our Christian young adult program.

Meet the Business Owner



Angie W.
Business Owner

Angie Woodward is an RN, who specializes in psychiatric nursing. Worked 10 years in intensive/emergency nursing, then transitioned to hospice care. In 1998 began working with at risk youth in a group home setting until in 2002 founded Trinity Teen Solutions along with her husband Jerry Woodward.

Mother of 4 children, married for 26+ years, devoted to Christ and family, caring, forgiving, empathetic to others, strives for perfection, loves animals and the outdoors, passionate about helping troubled teens and young adults.

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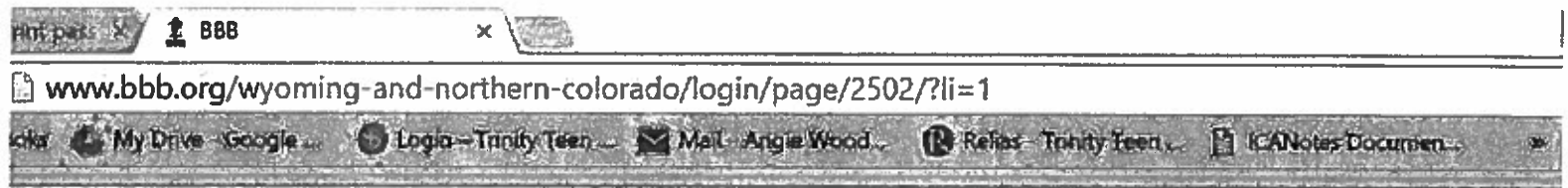
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"Trinity Teen solutions"

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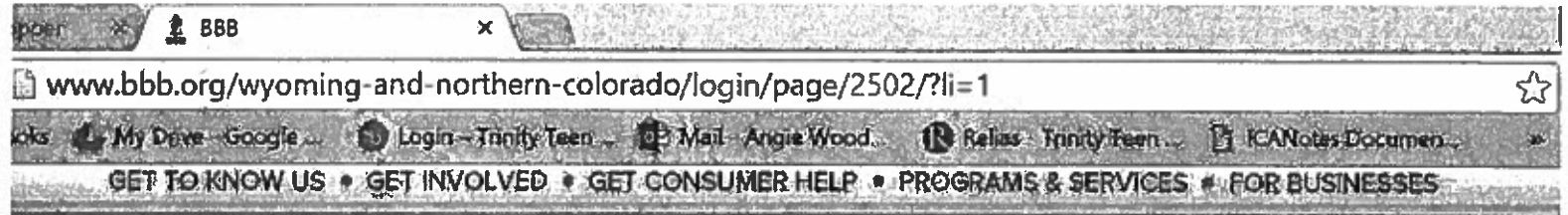
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I attended trinity teen solutions from 2007 to 2010 in which I was told I could not leave on my own until I was until completed the program. My three years there I experienced horribly abusive staff and a traumatizing program rigged to keep the patients there as long as possible. Staff lies to the parents and keeps them in the dark about their daughters treatment so as to get as much money out of them as possible all while the owners are regularly on fancy vacations and purchasing new expensive vehicles and toys. The living conditions for the girls there were terrible. Clothes rarely were suitable for the harsh weather conditions, we were not fed enough to keep up with the brutal work and physical consequences we were forced into. Different staff were more or less harsh with their treatment of us. Some were borderline abusive and power hungry where as others would sometimes treat us like human beings. We were denied things like showers, opportunities to use the restroom, medical attention or caring for twisted or sprained ankles. Communication between patients and family was heavily monitored and we were unable to communicate to how parents how bad the treatment was either our letters would be handed to us to rewrite, we would be denied phone calls or our family would be told not to visit. I have been home since the program since 2010 so seven years and am still suffering from crippling PTSD and anxiety. I have been seeing a therapist to deal with these issues since the beginning of getting out. This program and the staff are not to be trusted.

Review By: Chanel Plander (Chanelplander@yahoo.com) - Zip Code: 91360
Submitted: 02/10/2016





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tistics (Complete)

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Comment on Customer Review

it Extranet

I attended Trinity Teen Solutions from March 5th 2007 to February 10th 2010. It has been six years I graduated Trinity's "18 month program" and I am still suffering from the negative influences the shame based therapy me. The Woodward family has become very good at hiding their malpractice and the accreditation they have worth nothing. I would do deeper research before considering to send my daughter to this facility.

redited Businesses
(Days)

Review By: Chanel Plander (Chanelplander@yahoo.com) - Zip Code: 91360
Submitted: 03/03/2016

My Password

☒ Yes, this review was made by a customer of this business.

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Your Comment: This person,



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guy to have sex with and most of the time it was a guy I barely knew. Besides this, alcohol and pot were involved. Because of how miserable I was feeling I thought drugs could make me forget but each time it got worst.

I was raised in a very wealthy catholic family where people loved me unconditionally. I had everything I needed in order to become a nice and healthy girl with a great education. I was considered one of the best athletes from my region. From a young age I played basketball, volleyball and soccer. I did not have an excuse not to be successful in life. Even though I had all these gifts and talents, I was very hurt from my childhood. I lived with an abusive older brother who was constantly tearing me down. Because of this, I started to seek love from the outside because of how unworthy I felt.

Toward my last days before arriving at trinity was when I was losing control of my life. I was on the line of being expelled from high school because of drugs, I was having sex with numerous guys I did not know and had no relationship with my parents.

Trinity has changed my life. I finally looked deep into my life on why I did such things. Trinity has taught me the true meaning of life, one I did not know. Trinity has also helped me to find Christ and build my relationship with him. Every day staff gave us different challenges to grow and succeed in areas we never thought possible. Life has a beautiful meaning and is great to be finally experiencing it. There is more to life than drugs and sex.

-C.N. San Juan, Puerto Rico

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Testimonial 5

My life before Trinity was an absolute mess. Anything you could think of, I was probably doing it. I know that if I had not come to Trinity when I did, I would not be alive right now. I was anorexic and had been for a long time. I started cutting in the seventh grade and by my sophomore year in high school it got much worse. I was drinking and smoking whenever I could. I was also a lesbian. Anything I could get away with, I would do. I went to a catholic all girls' school with great teachers and environment. My family was always supportive and encouraged religion. Yet I hated everyone and everything around me. I cannot even count the times that I had either tried or thought about ending my life.

Just before I came to Trinity, my girlfriend and I were fighting, I was failing all my classes in school and I was planning to run away or kill myself. Sounds hopeless doesn't it. That is what I thought to. My parents decided to put me in the psychiatric ward of the hospital. I spent a week there on antidepressants not really getting any better. Then my mom and dad told me about this program and I agreed to go ahead and give it a try. Before I knew it, I was here.



HOME TREATMENT PHILOSOPHY PROGRAM MODEL ABOUT US DIRECTORY

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As I look back on everything that has happened, I do not even recognize myself. I looked like I was dead and life had no real meaning for me. Now I have a light in my life and more than anything, I have hope. Trinity has given me the chance to live and move on with my life.

I have only just begun the journey here but I am looking forward to my life. Life is an exciting thing and I am happy to be alive.

-C.P. Thousand Oaks, California

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Testimonial 6

By anyone's standards, sixteen year-old Dennett's life was out of control. She was locked in the mental ward of a Maryland hospital, where the emergency room crisis counselor sent her after she threatened to kill her parents. It was either that or jail, so an unrepentant Dennett allowed herself to be committed, hoping to score enough prescription medicine to continue her addicted lifestyle.

Things had been spiraling downward for a year, ever since Dennett made what she now calls "the worst decision of my life." In one night, the adopted daughter of Baptist ministers got drunk and tried drugs for the first time. And in those lowest, most self-destructive of acts, Dennett thought she found a few hours of escape from the emotional issues that plagued her.

Dennett never felt like she fit in. Making friends seemed harder for her than for other children. Her emotions controlled her; she was hyper one minute and viciously angry the next. Rejection crushed her, whether it came from an elementary school playmate or from a God she thought didn't make her good enough to live up to her own expectations. She was a mistake, she thought, and after a distant cousin committed suicide she became obsessed with thoughts of death and dying, believing that she wasn't worthy to live.

In eighth grade, Dennett met a group of kids who welcomed her and made her feel like part of a clique. She didn't care that they used drugs and even sold them. When they invited her to a party, she willingly went along, ready to try whatever they gave her in order to be accepted.

Three months after her first experience with marijuana, Dennett was a mess. She did some kind of drug every day, from pot to pills to whatever she could find in the medicine cabinet. Getting high took over her life; she craved the next experience even when she had just taken something. She sold drugs and her own body to pay for her habit. "I couldn't go to sleep at night without drugs. I couldn't stay awake without drugs. I couldn't do anything without drugs. I was trying to hide so much and mask so much pain through partying. It was all so tiring," she remembers now.

Create a site

HOME ABOUT

Trinity Teen Solutions Survivors



ABOUT US

Trinity Teen Survivors is a website dedicated to us former Trinity Girls telling our stories about the abuse we recieved at Trinity Teen Solutions. TTS is an all girls, catholic, residential treatment facility located on a ranch in Clark, Wyoming (aka the middle of nowhere). The aim of Trinity is to help troubled teen girls to learn the tools they need to cope with the stresses of their lives back in the "real world." However, the owners, Angie and Jerry Woodward are not qualified to take on such a task. Many of the practices at TTS have questionable legality. Girls have reported feeling retraumatized and worse off than they were before leaving.

For more information on Trinity Teen Solutions, click here: <http://www.trinityteensolutions.com>



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Trinity Teen Solutions Survivors

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MOLLIE'S STORY

June 10, 2015 | Mollie Lynch



I was admitted to Trinity Teen Solutions in July of 2010, and I was discharged in July of 2012. My parents paid roughly \$300/day for me to leave with more issues than when I'd been admitted. The staff was underqualified, and that's an understatement. Most of the staff we interacted with daily were only several years older than us, and lacked the qualifications to effectively aid in youth treatment. The staff were often recent college graduates who hoped to make an impact on troubled youth, but upon signing on to work at Trinity they were brainwashed to treat us like criminals, and given a position of authority became less interested in

helping us, and more interested in utilizing their positions of power. For example, there was one staff who lied about my actions on multiple occasions so that I would receive heavy physical consequences (hill run), and I could not contradict her or I would be given an additional hill run for "lying," and saying I'd been unjustly accused. In retrospect, I would trade my 2 year sentence to Trinity for a sentence to 2 years at Camp Greenlake of "Holes."

Angie and Jerry rake a ridiculous amount of tuition per girl, underpay the staff who lived with us for days at a time, and cashed in for big ticket items for their family. They encouraged the staff to break us down and treat us harshly to produce positive results. We were forced to be "silent," sit on a chair, be shunned from the group, and stare at a wall for months at a time until we decided to "accept the program and work on our lives."

This was a form of breaking us down and giving us no option but to accept maltreatment, give harsh feedback, and tattle on fellow patients to further our own treatment so we could progress and get out before other girls. If we turned against one another and threw girls under the bus by tattling on them or shaming them biweekly by blasting their weaknesses and slip ups at the Holy Cowgirl Forum, then we looked better in the eyes of staff.

At one point, I remember having to cut myself off from my conscience just to tear down girls in these assessments and fake my way towards progression in the program because the entire concept of tearing girls down to build yourself up made me so sick.

To clarify, biweekly at Holy Cowgirl, we sat in a circle and staff assessed us on our progress in front of all the other girls. The girls would also give assessments. Some girls heard only negative things and were beaten down for months, years. I was there for 2 years and probably had 6 positive HCG forums, even though I busted my behind for over a year of my stay.

If I gave a girl who was also treated harshly an assessment that spoke positively of her, I would be accused of "buddying up," or befriending girls and neglecting my personal development. Some girls were treated significantly more harshly than others. For example, Trinity advised my family not to speak to me altogether for months at a time while I was in treatment so as to aid in my personal development. In that time I received an immense amount of challenges. I had to run everywhere I went, even if just from the kitchen table to the kitchen sink. But also doing other tasks on the ranch and around the cabins, which was very physically demanding. I was in

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Trinity Teen Solutions Survivors

Mollie's Story

June 10, 2015

|

Mollie Lynch

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At random moments throughout the day i would be given a cardboard heart while doing whatever task I was doing. Every girl and staff would stop what they were doing and stare at me for an allotted amount of time while I did my task and was usually yelled at by a staff in particular while I did that task, and she told me all of the things I was doing wrong. Then the girls would go around and tell me when they saw me acting like a "victim," that day. All of this was brought on because I told my therapist that my parents were the primary issue in our relationship.

I'd taken ownership as far as I could, but my issues mainly stemmed from my parents choosing to put me on maximum dose antipsychotropic medications that I didn't need from ages 7-17, instead of taking the first therapist's advice and spending time with me. From there on out my mother and older sister verbally abused me (and sometimes physically...for example, my mother and I had a verbal altercation that resulted in her holding me to the wall by my throat, cutting off my air while she yelled at me while the breath was choked from me) and my dad enabled them to do so. At the same time I was on the watering challenge. This was in the winter, so troughs were often frozen or not drank down by the animals, and I'd have to clean them out and refill them, as well as fill the water of any girl who needed it. So I would have to run back and forth to the fence (because of the running challenge) while carrying a cardboard heart (which then got inevitably soaked and was replaced with a large boulder I had to carry everywhere instead of a cardboard heart). The water was freezing because it was winter In Wyoming, so my hands would feel like they could fall off by the end of that ordeal. And because staff always felt compelled to drag out my challenges as long as possible, even when I was doing them well, they added to my water challenge carrying a 3x1.5x1 ft. animal trough at ALL times to my list of challenges.

Yes, so I would then have to run miles a day with an animal trough. I'm 5 ft 1, so the trough would bang against my legs as I ran, and I was covered in large purple, yellow, and black bruises after WEEKS (months?) of this challenge. After all these challenges my parents were allowed to speak to me again. They asked me how things were on the ranch, and I told them.

Well, my privileges to speak to my parents were again revoked for a couple more months. I was, at times, tied to girls or animals by a leash (at one point I was tied to a girl and 2 goats by a leash). I was even denied therapy for over a month at one point because staff claimed I wasn't taking it seriously because I wanted to address the issues with my mother and sister (we can refer to those as "the real issues").

Another thing that comes to mind is at one point, the staff noticed I phrased things awkwardly and couldn't remember exact phrases they'd said, just the general idea. This was assumed to be manipulation so I was automatically given a challenge accompanied with physical punishments to shame this behavior out of me. Come to find out, in actual therapy Post-TTS, that the unnecessary medications my parents had me on for 10 years altered my cognitive functioning and I have some memory loss issues.

In my time at TTS I there was a lot of emphasis on developing an identity. I felt that I was truly being authentic to myself and to God, and staff told me I wasn't doing it right. They then gave me handwriting worksheets (you know, for kindergarteners), wouldn't let me wear a sweater if I was cold and no one else was wearing a sweater (I'm from Florida!!) made me wear my hair ONLY in a pony tail on the center of my head. I could only wear red on MWF, and blue on T and TH. amongst other things to make me more "normal." And if I asked for my medications in a way that they didn't like, I would receive a physical consequence because taking a medication isn't "normal."

Many punishments were given at TTS, but the biggest, most dreaded physical punishment Trinity staff would give (for lying, stealing, cheating, supposed manipulation, or if they randomly decided ur behavior/attitude warranted it) was a "hill," run. I say "hill," because it was a petite, steep MOUNTAIN. We couldn't stop on the way up or down or we would have to start over. And to top off those gems, it was riddled with sage brush, unstable rock, and rattle snakes. "Avoid rattlers," they'd say. "Don't stop or you'll have to start over."

The staff couldn't do a fraction of what we did on a daily basis and had no empathy for the physical hardships they put us through. And in addition to physical consequences and "challenges," we also did manual irrigation, hay runs, fence repairs, cattle work, animal breeding, birthing, vaccinations, and manually removed rocks for 5 hours a day during the summers.

Regardless of what your challenges or punishments were, we were all allotted the same amount of food. So girls who had no physical challenges were given the same food rations as a girl who ran miles a day while holding a trough half the size of her, and did most of the ranch chores AND the most labor intensive cabin chores. What a joke! I'd also like to point out that they say that they give us these challenges to "break us down," to soften us and open us up to treatment. They told my parents that I "thrive under rigorous structure and activity," BUT rigorous structure and activity is not conducive to aiding in my development. In fact, those things make me extremely anxious and overwhelm me easily.

Trinity asses your child's weaknesses, and uses them to the advantage of the program to create additional unnecessary problems for your child and keep them their longer. One of the primary reasons I was sent to Trinity was to help with my anxious habit of hair pulling (from eyebrows

and eyelashes) and Trinity saw to it that I was made as anxious and uncomfortable as possible, so as to increase the urges that brought my parents to send me away to being with. I might also add, I took a long time to reach a soft spot in my treatment, probably 10 months. And even after I reached that point, Trinity spent another 14 months aiming to break me, and by no means in a way that might be viewed as therapeutic or productive. Also, in my time there I endured several feet injuries to my tendons because of the manual labor.

Angie and Jerry run a work camp. They get paid for your kids to be shamed, belittled, and work for them. They take advantage of desperate parents, or parents who just want their kids to be someone else's problem. Angie tells parents that she is the "mother hen," and Trinity is a "family environment."

I'm confident that in my 2 year stay I could count my interactions with Angie Woodward on my hands- even if I had to get a few fingers amputated! And family environment? We weren't allowed to speak to one another, and it was rare that we got to speak even with staff, much less a chance to speak sincerely without fear of consequence.

In my stay there I saw a girl try to kill herself by drinking bleach. I have a, now, good friend who at Trinity Teen Solutions attempted to kill herself multiple times...hanging herself, cutting herself, running away. That place was a nightmare in the flesh. Before TTS I'd never had sex. Now, 3 years after TTS, I have an 8 month old because Trinity shuts you off from friends, family, and positive relationships and after TTS MANY, if not all, of the girls who go through the program, turn to men and sexuality to validate them. I have PTSD and suffer from nightmares regarding my experience at TTS. I have major abandonment and trust issues as a result of my being sent to live with incompetent strangers for 2 years while the outside world left me behind, family included.

Trinity Teen Solutions offers no solutions. You and your family will leave Trinity with more issues than you went there with. The only good thing about the place is that you are so alone in your struggle there that you are forced to learn to love yourself and develop your own identity, even if Trinity will shame you to the grave for not being enough of what they want you to be no matter how hard you try.

My parents have 8 kids and now have no money because of Angie and Jerry's manipulation. But don't worry, parents, the financial hardship you are undergoing is my fault too- not Angie's and Jerry's- because I "good enough" to go home (or, more likely, I was doing a great job with ranch work and my parents were paying big bucks, so Angie and Jerry couldn't let me go till my parents were in debt.)

For the longest time I was confused and felt indebted to Trinity because my home environment was so miserable before admission that I probably would've committed suicide if I had not been removed from the home environment. I felt I owed Trinity for my pulse, but I realized overtime that I could have been removed from the home environment and sent ANYWHERE. I did not deserve the trauma that was Trinity Teen Solutions, even if it resulted in a pulse.

In 2011 a man came in as part of an investigation against TTS. We spent the day before scrubbing the cabins from top to bottom. The day of the investigation, seasoned Trinity girls were selected by staff members to speak with the investigator. The investigator asked a series of questions I could not, at the time, answer truthfully for fear of consequences I might receive if Trinity got a bad review. Of course, they didn't give us all the details on what was going on, but it was very out of the ordinary, and given the things that went on there, one could guess it wasn't just a game of twenty questions.

I wished for the longest time after that I had told the investigator how I really felt about what things were like at Trinity, but Angie and Jerry know how to manipulate the system enough so that they can avoid getting a bad wrap. If I had told the truth I might have been put "on chair," to stare at the wall and be silent for months, or dropped levels, or received more ridiculous "challenges."

But for the record, the case against Trinity in 2011 was only closed because girls within TTS were too scared to speak up at the time! I left Trinity being taught that nothing I did was good enough, that everything bad in my life was my fault. For instance, in talking with therapists and parents about a molestation at age 13, it was concluded that it was my fault because I had previously had a crush on the boy.

Trinity is a joke, not a treatment facility. It manipulates parents, shames and makes problems for young girls; and results in hardship, trauma, and further strain in relationships with family and the self.

I'm busy working on my blog posts. Watch this space!

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Milton, FL

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Trinity Teen Solutions

Counseling & Mental Health, Rehabilitation Center

89 Rd 8RA

Powell, WY 82435

☆☆☆☆☆ 2/9/2016

My previous, detailed review of Trinity, was removed by Yelp because the content depicting my stay at Trinity was deemed "better suited for the authorities," on the day that my post got bumped to a "recommended review," status. (Hmm, wonder why that might be.) That being said- Trinity Teen Solutions is an ineffective, unregulated program that uses tactics of shaming, and bullying to tear down young girls and families during an already difficult time. The owners' of the program are running a scam, and advertise Trinity as a boarding school for troubled girls, with emphasis on animal therapy. There was no animal therapy. Their website touts a 98% success rate, but every girl I went there with now suffers PTSD, is into drugs or alcohol, or became pregnant out of wedlock in negative circumstances. In addition to all that, the majority of the girls who went there (if not all), now have severed ties with their families, because they cannot understand how traumatic the experience at Trinity was for us, as the business owners mislead parents throughout the entire treatment process. There are other treatment options that are safe, regulated by the government, and are much more suited to help a girl who is struggling. I am stronger today in spite of Trinity, not because of it. Also, several of the reviews on here, are from girls that do not exist. They have reviewed Trinity Teen Solutions on Facebook as well, and the profiles are clearly fake. Their only friends are the couple of other fake "attendeess," who wrote fake reviews, and Kyle Woodward, one of the children of the family who owns the program. Funny enough, Kyle Woodward is also listed on the Trinity Teen Solutions website as being their "Media Expert." How interesting..

About Mollie L.

Rating Distribution

5 stars	3
4 stars	0
3 stars	1
2 stars	0
1 star	1

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👍 Useful 9

😄 Funny 1

🌟 Cool 1

Location

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Yelping Since

March 2015



Tit 4 Tat

\$ • Tobacco Shops

2304 W Fairfield Dr

Pensacola, FL 32505

☆☆☆☆☆ 11/19/2015

My experience getting pierced was great. My piercer sanitized everything thoroughly, talked me through everything, and made sure I was comfortable and informed. I was disappointed that my belly button piercing rejected, but I have highly sensitive skin so I doubt that was any fault of the piercer. I will say that the bars she used for one of my other piercings were too short and this caused the balls of the bar to imbed into my skin, which was extremely painful. Those had to be taken out because they were bleeding and bruised; and they ended up closing. Great environment,



friendly staff...just be sure to double check your bar size and have your piercer do the same. I'd use them again.



Wasabi House
\$\$ • Asian Fusion
4797 Hwy 90
Pace, FL 32571

★★★★★ 11/19/2015

The service is always great, and food comes out quick. Best tasting Asian Fusion food around- I eat here any chance I can get!



La Hacienda
\$ • Mexican
4601 Highway 90
Milton, FL 32571

★★★★★ 11/19/2015

Great family atmosphere, fast service, reasonably priced, nice ambiance. Love eating here!



INKSANE Asylum - MOVED
\$\$ • Tattoo
1922 Creighton Rd A
Pensacola, FL 32504

★★★★★ 3/30/2015

Very positive experience getting my first tattoo done by Brandon. He explained everything well, was very patient with me, made sure everything was exactly how and where I wanted it to be. I will definitely be coming back here again. My friend got her first tattoo done with me as well, and she highly recommends Brandon and the rest of the Inksane Asylum crew.



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Mollie L. October 12, 2012

Trinity is a true miracle

★★★★★

Trinity's focus on the mind, body, and soul helped me to take a journey toward growth in relationships with my family, myself, and ultimately my God. There is not a day when I don't thank God for the work TTS has done in my life. I struggle daily. I still have temptations and struggles. This is to be expected, however TTS allowed the opportunity for me to change the way that I handle these struggles and temptations. TTS has provided me with the tools that I need to be successful. I was on the verge of falling off the edge of a steep cliff, and now I am where I am supposed to be. The staff was wonderful and extremely patient with me throughout my 2 year journey. I was given everything I needed to see God's plan for my life and to become more of the woman God is calling me to be. Thanks to TTS I am now a high school graduate. My grades improved drastically in my time at TTS, my GPA increasing by 40% by the time of my discharge. I have also developed skills which have helped me to obtain and sustain 2 jobs, volunteer work, parish ministry, family life, healthy friendships, and hobbies. The time away from home could be difficult at times, however from admission 2 years ago, discharge a few months ago, to now I can see that every moment on the soil of that Wyoming ranch was exactly what I needed to live my life the way a young woman is truly meant to live. I know my worth and my dignity. I know that I am beautiful and loved. I have plans for my life that reach far beyond the realms of friends, boys, medications, etc. I plan to attend college in the spring, and I am doing well in the ongoing fight for my life. Trinity is a true miracle, and there is nothing else like it. Trinity was my 16th birthday gift, and discharge was my 18th birthday gift. If you want to give your daughter her life, Trinity is the way to go and I can say with confidence that it is a gift that you will not regret giving and that she will be happy to have received with time.



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Brooklyn, NY
14 3



Anna A.
Austin, TX
48 2



Chanel P.
Thousand Oaks, CA
18 10



Samantha S.
Long Beach, CA
33 3



Patrick M.
Pensacola, FL
8 0

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Escondido, CA
96 12



Mollie L.
Milton, FL
5 5



Abigail M.
Milwaukee, WI
55 0



Halsey O.
Thousand Oaks, CA
31 32



Courtney H.
Thousand Oaks, CA
45 1



Redneck Chef R.
Moreno Valley, CA
227 5



Kat P.
Oceanside, CA
53 3



Samantha S.
Long Beach, CA
33 3



Wesley Y.
Thousand Oaks, CA
73 11



June C.
Orange, CA
21 2



Jennifer B.
Agoura Hills, CA
18 3



Frank P.
Los Angeles, CA
65 1



John L.
Newport Beach, CA
173 12



Rachel D.
Agoura Hills, CA
20 0



Thomas A.
Pasadena, CA
85 0



Victoria D.
Chula Vista, CA
11 0



Jen W.
Dixon, IL
2 0



Kayla H.
Alliance, NE
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Kristy N.
Irvine, CA
34 17



Luke H.
Agoura Hills, CA
133 4



Nick S.
Bad Axe, MI
70 2



Courtney A.
Mission Viejo, CA
59 1



Kelsie V.
Fort Collins, CO
79 1



Anna A.
Austin, TX
48 2



Mollie L.
Milton, FL
5 5



Abigail M.
Milwaukee, WI
55 0



Chanel P.
Thousand Oaks, CA
18 10



Sara M.
Long Beach, CA
137 21



Kyle C.
Bend, OR
61 1



Lincoln B.
Laguna Beach, CA
105 1

Mary V.

Mary V.
Anaheim, CA
23 11

Moriah V.

Moriah V.
Arroyo Grande, CA
12 1



Nicole F.
Irving, TX
134 1



Kristen P.
Dallas, TX
58 1



Katy S.
Long Beach, CA
12 3



Scarlet B.
Los Angeles, CA
106 5

Yvonne S.

Yvonne S.
Long Beach, CA
23 0



Marisa A.
Washington, DC
53 0



Christiana S.
South Padre Island, TX
33 0



Meg K.
San Diego, CA
47 0



Nat F.
Mammoth Lakes, CA
15 0



Lizzie C.
Key West, FL
38 0



Paul S.
Irvine, CA
42 0



Lucas D.
Lake Forest, CA
164 0



Sofia N.
New York, NY
43 0



Anna S.
Clifton, VA
34 0



Jenna W.
Santa Barbara, CA
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Kylie M.
Hamburg, NY
63 0



Bridget A.
Brookline, MA
17 0



Caroline C.
College Park, MD
39 0

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EXHIBIT

B

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

TRINITY TEEN SOLUTIONS, INC.

Plaintiff,

v.

CLAIRE MALONE MATSON, CHANEL
PLANDER, AND MOLLIE NICOLE
LYNCH,

Defendants.

Civil Action No.

**DECLARATION OF PATRICK B.
MONAHAN IN SUPPORT OF
DEFENDANTS' PETITION AND
NOTICE OF REMOVAL**

DECLARATION OF PATRICK B. MONAHAN

I, Patrick Burke Monahan, make the following Declaration pursuant to 28 U.S.C. § 1746 in support of the Petition and Notice of Removal of Defendants Claire Malone Matson, Chanel Plander, and Mollie Nicole Lynch.

1. I am an associate with the firm Powley & Gibson, P.C., attorneys for Defendants Claire Malone Matson, Chanel Plander, and Mollie Nicole Lynch in the above-captioned action.
2. I am over 18 years of age and competent to make this Declaration.
3. I have personal knowledge as to each fact attested to herein.

4. Attached as Exhibit A to this Declaration are true and correct copies of excerpts of Plaintiff's website, accessed on April 27, 2016. The page numbers at the center of the bottom margin, included for the Court's convenience, are the only additions made to these excerpts.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 4th day of May, 2016.

A handwritten signature in black ink, appearing to read "Patrick Monahan", written over a horizontal line.

Patrick Burke Monahan

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Therapeutic Treatment Approaches

Trinity Teen Solutions implements many therapeutic approaches to help defiant teens overcome the issues that are holding them back. By using a ranch setting, animal assisted therapy and an individual care plan that is tailored to the needs of each defiant teen girl, our therapeutic boarding school challenges young women and troubled teens alike to create healthier lives and make appropriate choices, which honor God, herself and others.



Trinity Teen Solutions' Adolescent Counseling, Modalities, Activities and Therapeutic Approaches

- 1. Family Systems Therapy:** Our therapeutic boarding schools examine each defiant teen girl in her context, including family and peer relationships, relationships to authority, relationship to self and to God. We use intensive Family Systems Therapy, Parent Counseling Portal, Family IQ, weekly updates and scheduled telephone conferences to involve the entire family in your daughter's treatment.
- 2. Reality Therapy:** Our therapeutic boarding school for girls uses confrontation, personal choices and natural consequences as challenges for growth in our adolescent counseling.
- 3. Experiential Therapy:** Our girls therapeutic boarding school uses the ranch and our wilderness contexts, along with living in nature and observing animal behaviors to provide opportunities to rethink behaviors, solutions and attitudes in defiant teens.
- 4. Wilderness Therapy/Outdoor Behavioral Healthcare:** By changing the setting of young women, we challenge the individuals comfort level, promote a sense of God's presence and peace, and invent new ways to handle their personal needs and problems.
- 5. Strategic Therapy:** Our girl's therapeutic boarding schools use therapeutic directives to reduce uncontrollable or destructive behaviors in struggling teens. These directives are specifically tailored to the individual, her family and peers.
- 6. Animal Assisted Therapy:** Our therapeutic boarding school for girls uses horses, cows, pigs, cats, dogs etc. to help at risk girls examine their own behaviors, and needs, and to take responsibility for their actions and choices in relationships.
- 7. Equine Assisted Psychotherapy:** Our all girls therapeutic boarding school uses equine assisted psychotherapy (EAP) a powerful and effective therapeutic approach that has an incredible impact on individuals, youth, families, and groups. EAP addresses a variety of mental health and human development needs including behavioral issues, attention deficit disorder, substance abuse, eating disorders, abuse issues, depression,

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anxiety, relationship problems and communication needs.

8. **Christ-Centered Counseling:** Our all girls therapeutic boarding school uses the life of Christ and the Bible in our adolescent counseling to instill personal conscience, and a sense of right action in communion with God, self and others.
9. **Rational Emotive Behavior Therapy:** Our therapeutic boarding schools for girls use direct examination of thought, feelings and action, and resulting problems from poor choices to teach each defiant teen how to monitor and control her behavior.
10. **Eye Movement Desensitization and Reprocessing (EMDR):** Our girls therapeutic boarding schools use Eye Movement Desensitization and Reprocessing (EMDR) in our adolescent counseling which integrates elements of many effective psychotherapies in structured protocols that are designed to maximize treatment effects. These include psychodynamic, cognitive behavioral, interpersonal, experiential, and body-centered therapies. EMDR is an information processing therapy and uses an eight phase approach. EMDR is an effective way of healing from the trauma of rape, molestation, neglect, abandonment and other traumatic events.
11. **Cognitive Restructuring:** Our therapeutic boarding schools teach the struggling teen girl to examine the way she thinks about herself and her issues. We also help her to identify her emotions. When you change the way the person thinks, you will change the way she feels, and this will change her responses.
12. **Confrontive Therapy:** Our therapeutic boarding schools adolescent counseling confronts negative behaviors by stating the facts about the defiant teen.
13. **Insight Therapy:** Our all girl therapeutic boarding school teachers your daughter to understand what is going on interiorly and facilitate an understanding of the cause of her defiant teen behaviors.
14. **Behavior Modification:** Our therapeutic boarding school for girls uses behavioral contracts that target problem behaviors and attitudes in a 6 level system. Levels of all girls are reviewed weekly in staff meeting and in Holy Cowgirl. As levels increase so do responsibilities and privileges for each girl.
15. **Solution Orientated Therapy:** Our therapeutic boarding schools for girls identify the strength of your daughter and your entire family. In discovering what has worked in the past we use that insight to eradicate defiant teen behaviors your daughter displays in the present.
16. **Supportive Maintenance:** Our girls therapeutic boarding school uses the activities of the daily schedule as opportunities to promote growth in targeted behaviors. Ranch life and daily schedule present new challenges and chances to choose different behaviors.
17. **System Focused Education:** Our therapeutic boarding schools for girls provides the most current information on symptoms, disorders and treatment. Specific strategies are offered to each family of defiant teens.
18. **Ordeal Therapy:** Our girls therapeutic boarding school frequently will make something an ordeal to impact behavior. When at risk teen girls go through an ordeal it will impact their behavior and change her.
19. **Crisis Intervention:** Our therapeutic boarding schools for girls deals with each crisis as they arise. We model techniques for resolution with the defiant teens.
20. **Relationship Therapy:** Our therapeutic boarding school for girls uses the dynamics of relationships to encourage emotional and spiritual growth. Our central philosophy is "the family teaches right action through example, teaching and role models. The family is the safe place where adolescent girls hear and understand values they need in order to thrive. As a staff, we provide such a family setting; where the girls know they are loved. They reciprocate those feelings. We lead, guide, and teach by example.
21. **Psychiatric Consultation:** Our all girls therapeutic boarding schools incorporate psychiatric consultation into behavioral objectives, therapeutic directives, spiritual tasks, and homework assignments for each girl and her family. This is a bio-psychosocial approach that reaches a girl's mind, body and soul.
 1. **Adolescent Psychological Inventory (APS):** To identify psychotherapy in adolescence.
 2. **Keirsey Temperament Sorter:** To identify personality type of each girl and use her unique problem solving style to teach her.
 3. **Substance Abuse Inventory (SASSI):** To identify frequency of substance abuse and related stressors.
 4. **Youth Outcome Questionnaire (YOQ):** To identify problem attitudes and behaviors from parental and daughter's point of view.
 5. **Wide Range Achievement Test 4 (WRAT):** Measure the development of reading, spelling, and arithmetic skills.
 6. **Wide Range Intelligence Test (WRIT):** Measures verbal, visual and general IQ.
 7. **Parenting Alliance Measure (PAM):** Measures the strength of the child-rearing alliance between parents.
 8. **Marital Satisfaction Inventory (MSI):** Assess conflict within a relationship
22. **Personality Assessment:** Our therapeutic boarding school uses the Keirsey Temperament Sorter to assess personality type, how a young woman sees her world, moves in it and solves problems. We also outline her strengths and limitations.
23. **Career Counseling:** Our all girls therapeutic boarding school addresses career choices when age appropriate. We use career tests such as the Self Directed Search, and the Keirsey Temperament Sorter, in addition to individual therapy and group therapy.
24. **Group Therapy:** Our therapeutic boarding schools for girls uses group therapy to help young women invent new solutions to old problems, see personal strengths, identify needs and encourage progress.
25. **Individual Therapy:** Our therapeutic boarding schools for girls uses individual therapy and develop individual care plans to identify problems, invent solutions, evaluate progress, and prepare to re-enter communities.
26. **Nutritional Therapy:** Our therapeutic boarding school for girls uses complex carbohydrate/high protein diet, and pharmaceutical grade supplements to cleanse and improve physical and emotional health of defiant teens.
27. **Art Therapy:** Our all girls therapeutic boarding school uses art therapy to identify body image problems, future goals, expressing problems and group sharing, to enhance personal insight.
28. **Exercise:** Our therapeutic boarding schools for girls uses reasonable amounts of physical activity to promote health, induce expression of emotions and solve underlying problems, such as walking, jogging, calisthenics.
29. **Use of daily routine:** Our girls therapeutic boarding school uses the daily routine to enhance care of the self,

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encourage independent problem solving, increase organizational skills, and improve motivation in defiant teens.

- 30 **Bibliotherapy:** Our therapeutic boarding school for girls provides young women and her parents with relevant books and tapes to create self awareness and gain from the problem solving skills of others. We use, Reviving Ophelia, The Bible, Hinds Feet on High Places, Rachel's tears, Parent in Control, Back in Control, Screwtape Letters, Over-Indulged Children, just to name a few.
- 31 **Spiritual Activities:** Our therapeutic boarding schools for girls uses prayer, Mass, scripture reading, group discussion, role play and modeling to enhance the young woman's relationship with her Creator.
- 32 **Journaling:** At our all girls therapeutic boarding schools Journals are used to express feelings and reactions to events and map progress for defiant teens.
- 33 **Aftercare/Referral:** Our therapeutic boarding schools for girls will help the family make plans for aftercare responsibilities. Roles are clarified; an agreement on rules and responsibilities, supervision, and privileges is reached

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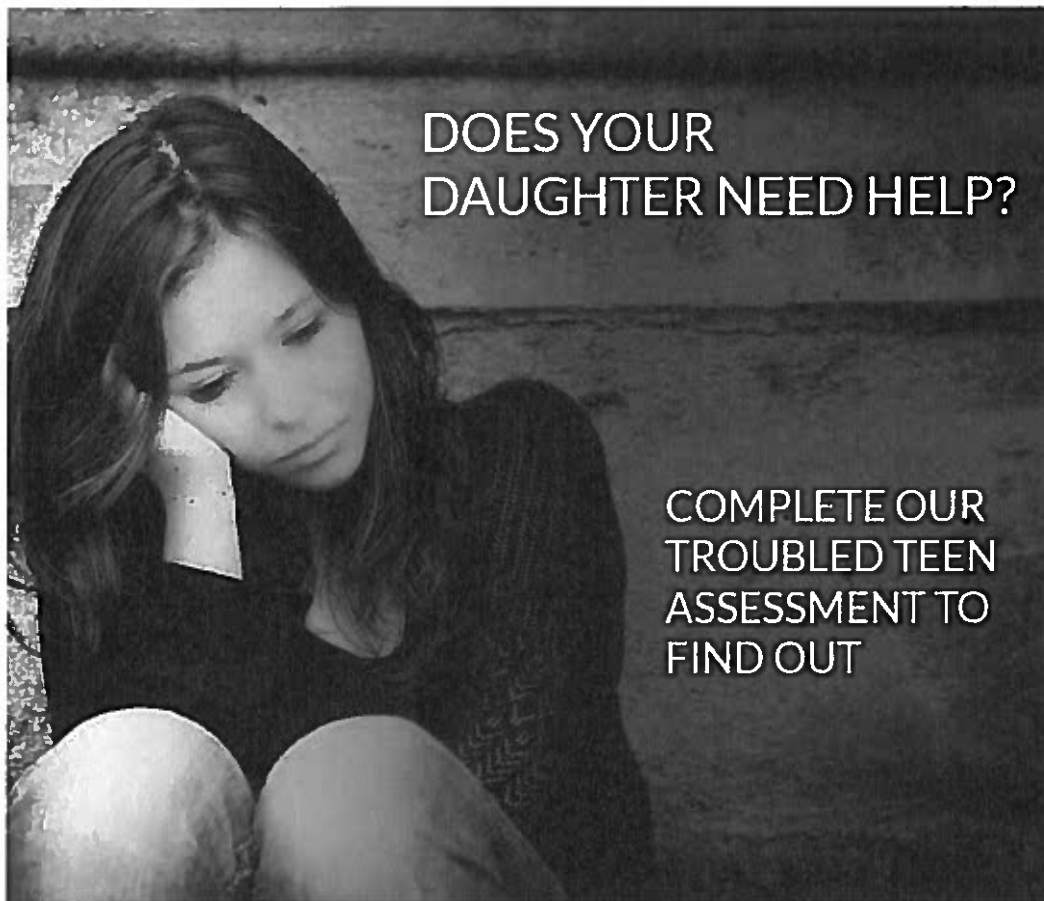
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Treatment Plans for Troubled Girls

It is imperative that the treatment plans of troubled girls be individualized to meet the specific needs of each child. No child's issues are exactly the same. Each of the struggling teens who enter our residential treatment program comes from a diverse background. Each one is dealing with different challenges. Each has her own hopes and dreams she wants to one day fulfill. These are the reasons that Trinity Teen Solutions creates an individual agenda for every young lady who comes into our care.



Trinity Teen Solutions Offers Individualized Treatment Plans for Troubled Girls

After an initial evaluation, your daughter's action plan will be developed. Her days at Trinity might be spent in animal therapy, wilderness therapy or experiential therapy. She will also be required to continue her education while at our boarding school for girls. Your child will also work on a 4,000-acre running ranch in order to build her values, work ethic and self-esteem.

Based on her physical condition and discharge goals, we'll create a list of activities, responsibilities, spiritual exercises and fellowship opportunities best suited for your daughter. This agenda will work to improve virtues and positive characteristics while reducing the occurrence of negative behavior and outbursts.

Animal and Wilderness Therapy

Through animal and wilderness therapy, your daughter will begin to find the loving, gentle person she used to be. Taking care of and meeting the basic needs of the animals on the ranch encourages her to be less selfish and more respectful of relationships. This process will increase motivation, self-discipline, self-reliance, personal accountability and self-sacrifice. These lessons are taught in a variety of ways as she coexists with a group of peers, instructors, animals and God.

Experiential Therapy

When your child experiences therapy – rather than just talking about it – she gains ground more quickly. Because Trinity is not an institution, but rather a family-style, residential treatment program, we are 100% hands on. While discussions are a vital part of the treatment process, progress only comes once your daughter begins to put into action those things she has recently learned about. (Find out more about experiential family therapy.)

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Our first course of action is never to place your daughter on medication immediately upon arrival. In fact, our goal is to have your child free of all medications by the time she is discharged. Many struggling teens come to us with physical and emotional issues for which they take medication. With a licensed nurse on staff, we are fully equipped to manage prescription drugs, evaluate progress and make recommendations about changes in dosages.

Upon being admitted to Trinity's residential treatment program, your daughter will begin a 90-day evaluation using her current medication regimen. After this time period, we will make suggestions about which drugs, if any, to change or discontinue.

Once struggling teens learn to identify, understand and manage the core issues that have put them in their current situation, they no longer need to medicate away the pain, anger, anxiety and impulsiveness. Our girls find being taken off medication to be a big relief... They feel as though they are making progress and accomplishing goals. That's because they are!

At Trinity, we are constantly monitoring, assessing, evaluating and implementing improvements with regard to your daughter's care. What's more, we offer emotional and spiritual assistance for you and your other family members so that you can also begin to heal.

Contact us today for additional information or for answers to questions you may have. One of our administrators or therapists will be pleased to provide any information you need about our unique residential treatment program. Please call 855-631-4424 to speak with a representative, immediately.

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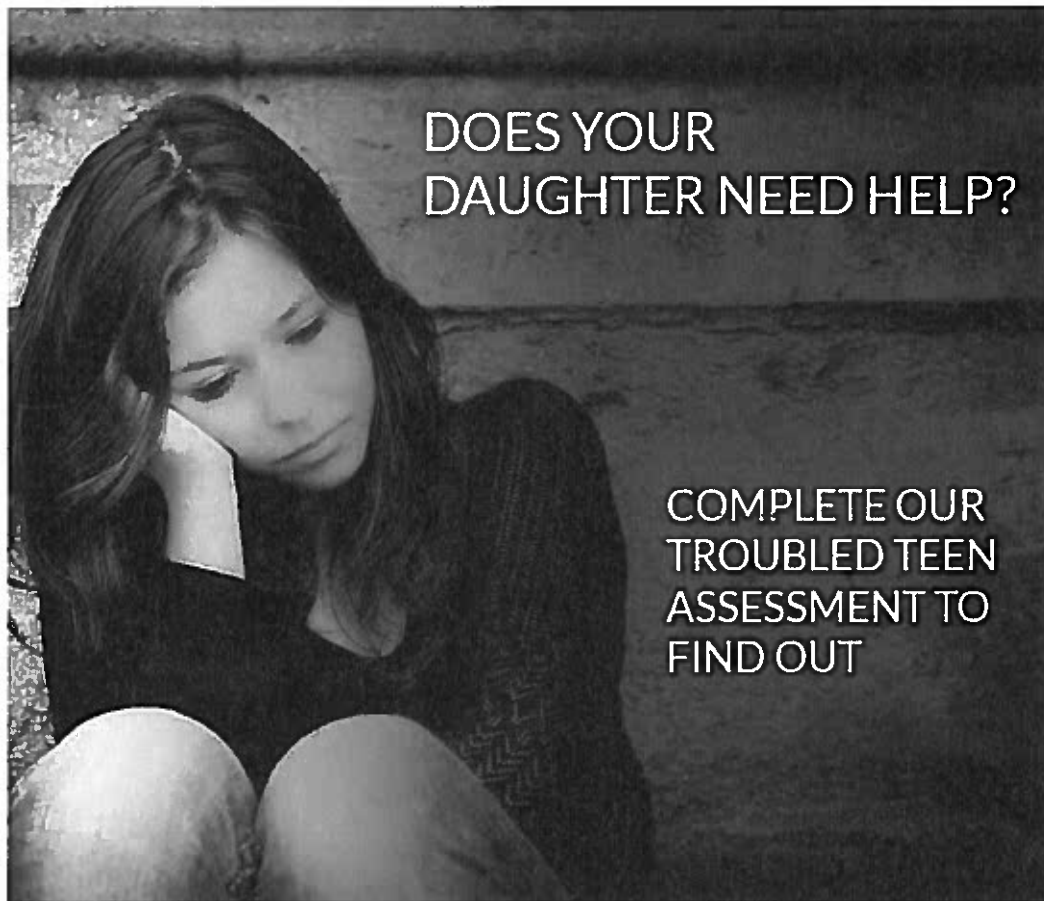
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Troubled Teen Girl's Journey in Treatment

Treatment for troubled teen girls is a **life changing journey** for **emotionally disturbed** teenagers. All troubled teen girls have similar patterns of behavior. With these patterns in mind, **Trinity Teen Solutions** has designed experiential learning activities that will minimize the behaviors that are destroying your daughter's life. At the same time, these experiential learning activities will increase her adolescent self esteem, enhance her unique personality and her hidden gifts. We have found that "talk" therapy alone is ineffective. Parents agree, they have talked till they are blue in the face, and have tried an array of counseling and therapy techniques to help their troubled teen girls. To approach emotionally disturbed teenagers, we use a variety of approaches that will ensure her compliance with minimal resistance.

Your daughter will want to be compliant with the program provided by Trinity just to increase her comfort level and meet her needs. Living in rustic cabins, working with and riding horses, performing ranch work and daily chores, and taking care of animals is a foreign way of life for most girls. Your daughter will need to depend on the staff to learn; if she resists, then her discomfort increases. This process immediately brings her closer to the staff and more receptive to learn new templates of behavior. This process builds adolescent self esteem, encourages trust and a loving relationship within the "community" which is made up of staff and clients.

The typical girl's journey at our troubled teen girls program is a journey that will enrich her mind, body and soul. Each girl needs to go through these stages in order to **internalize the changes** that she needs to make. The length of time that each girl remains in each of the stages varies according to her unique situation and background. The average troubled teen girl takes about 18 months to move through these stages effectively.

There are Four Stages of Emotional Growth During the Journey of our Treatment Program for Troubled Teen Girls

First, emotionally disturbed teenagers are in shock and disbelief that their parents did something about her behavior. This shock is the best consequence for her out-of-control behavior. You are sending a clear signal that this kind of behavior is unacceptable and will not be tolerated.

When she first arrives at Trinity her emotions and behavior will vary from anger, loneliness, sadness, remorse, manipulation, lying, and depression. During this time, she is the most vulnerable and will reach for something to make her comfortable again. It is amazing how even the hardest heart softens when it is distraught. As a means to provide



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help for troubled teens we encourage her to turn to God during this time to ease her discomfort. This is an important stage in preparing troubled teen girls to internalize the changes that she needs to make. She will want to make changes in her behavior because of her relationship with God, motivates her.

The next step is anger. Troubled teen girls will blame their parents, family, school, friends and everyone around them for their actions. The length of time that troubled teen girls spend in anger varies from one week up to months, depending on her history. Our mission is to get her to move from anger and blame to accountability. In order for her to begin to change her behavior she needs to take accountability for it.

The next stage is remorse. This occurs when the troubled teen feels sadness and remorse for her behavior. At this time, she takes accountability for her actions and sees the impact she has had on her loved ones and herself. When a girl feels remorse and processes the magnitude of her behavior she will not want to repeat them. This is when she is seeking help for her troubled teen behaviors, is open to change and wants to learn the tools to accomplish it. We feel that this is an important stage to turn the dial up on her conscience so that she is less apt to repeat the emotionally disturbed teenager behaviors you have been dealing with.

When a girl is going through this stage it is imperative to allow healthy outlets for remorse by crying, talking with staff, writing letters, physical work and being with animals that she has bonded with. We also focus on experiential learning activities that she enjoys to build a healthy adolescent self-esteem and hope for the future.

After remorse the girl now moves into action. Developing new habits of behavior on the old destructive behavioral templates takes time when providing help for troubled teen girls. This stage is lengthy and will give her the tools and values that she will need for her discharge. Most girls during this stage have successes and failures. It is important for them to fail so that they can learn how to pick themselves back up again. During this stage she will become over-confident and think that she has nothing more to learn. Usually this is when she fails and repeats some of the troubled teen girls' behaviors that got her here, particularly lying or manipulating. We think that this failure is important for her development to strengthen some of the basic values that she needs. For example: she would repeatedly work on self-discipline, by controlling her emotions and using her intellect to make decisions, rather than doing "what feels good". The longer that we can work with a girl in this stage the better she will be equipped to handle the pressures of society on discharge.

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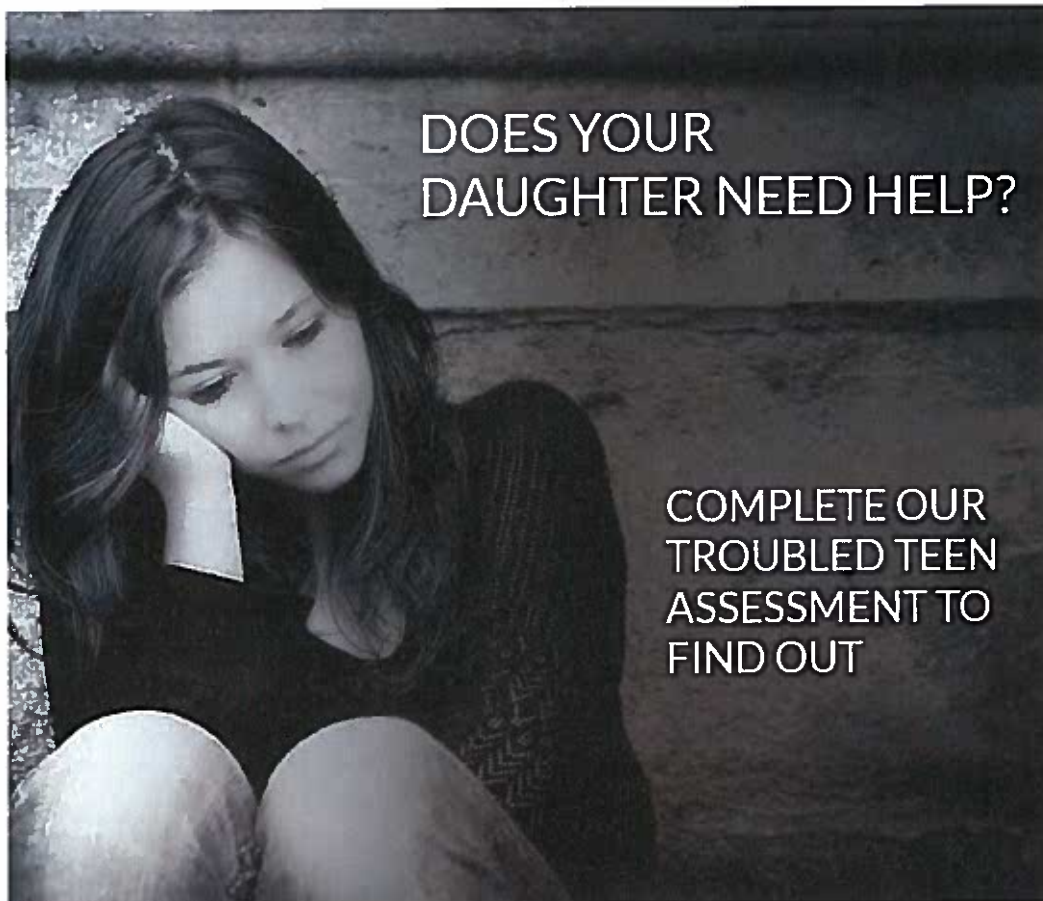
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Troubled Teen Girl's Journey in Treatment | Trinity Teen Solutions



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Girls



Verified by
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Angie Woodward
Verified Oct 29 2014

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TROUBLED TEEN SCHOOLS HASSLE FREE TUITION AND ADMISSION

When faced with the **overwhelming task** of placing your daughter into schools for troubled teens, the last thing you need to worry about is hidden fees, or incidentals that typical troubled teens schools apply. Unlike other treatment programs, our troubled teen boarding school does not tack on additional expenses for the application process, admission, enrollment, first and last month, clothing, medical expenses and activities. We understand how overwhelming this whole process is and want to make it as easy as possible for you when admitting your daughter into our troubled teen school. Therefore, Trinity Teen Solutions has chosen to go with a hassle free all-inclusive tuition fees for our troubled teen school.



The daily interventions and activities are formulated to reach your daughter's special needs in order to help eliminate her problematic behavior. This process takes about 18 months.

TUITION FEES INCLUDE:

- Weekly Group and individual therapy
- Personality Inventories and Clinical Assessments
- 24 hour supervision by our highly specialized staff
- Therapeutic approaches listed on our Therapeutic Approaches web page
- Pharmaceutical grade nutritional supplements
- Clothing
- Toiletries
- Holy Cowgirl Manual - includes personal and spiritual growth material.
- High protein, complex carbohydrate foods
- Transportation to and from Yellowstone Regional Airport In Cody, Wy
- Family intensive therapy
- Phone conferencing with staff
- Disposable cameras

FEES NOT INCLUDED

- Medication management by Psychiatrist

Get Help Now

First Name

Last Name

Childs Name

Street Address

City

State

Zip

Insurance Type

Insurance Company

Phone

Email

Comments



Enter Code

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- Prescription medications
- Any other academics not listed on TTS Academics, like college curriculum
- Medical, dental, orthodontics and eye care
- Shipping of items back to parents

CALL TODAY TO GET A QUOTE FOR YOU DAUGHTER'S TREATMENT **855-631-4424**

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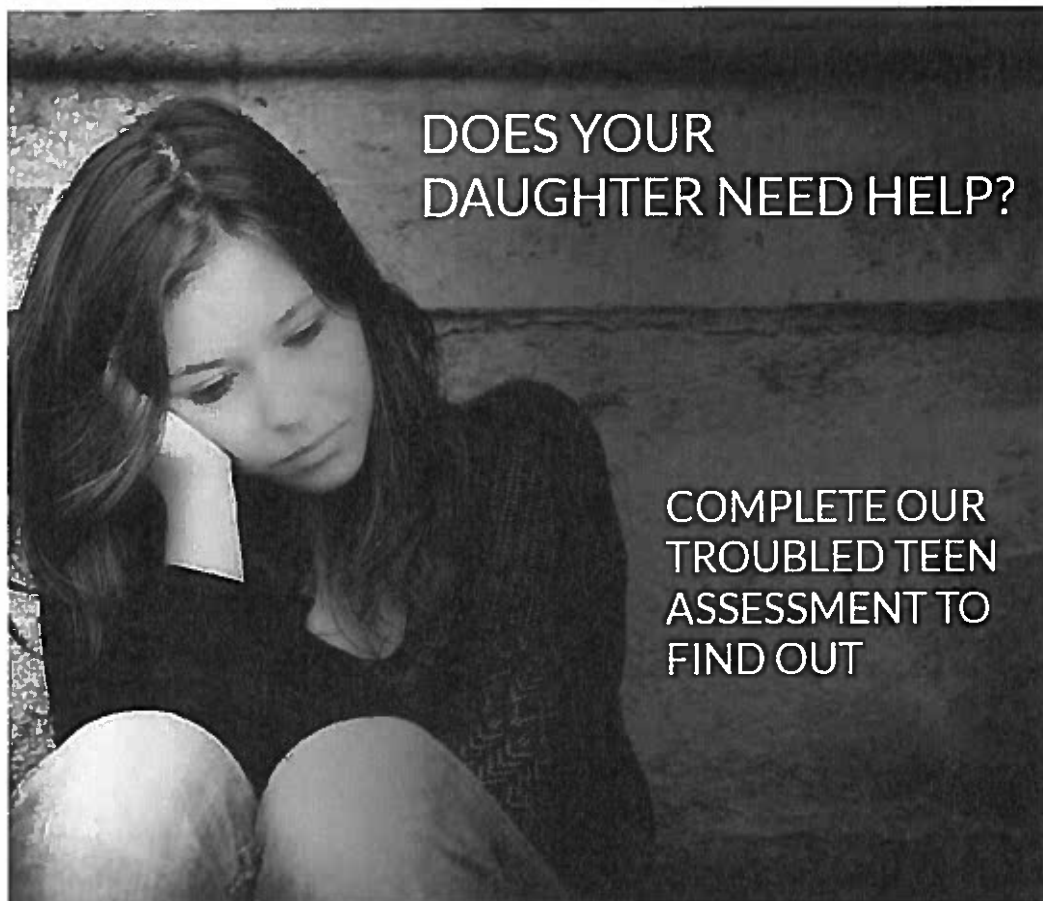
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4/27/2016

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Character Education | Trinity Teen Solutions

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Character Education

Character education plays a vital role in the healing and transformation of girls at Trinity Teen Solutions. Trinity Teen Solutions Catholic boarding school for girls enables your daughter to continue her education during therapy. Please call 855-631-4424 to speak with a professional.

Character Education at Trinity Teen Solutions

While your daughter's well-being is paramount, her education shouldn't suffer while she's undergoing therapy. Unlike other schools for troubled teens, Trinity's Catholic boarding school for girls goes to great strides to ensure your child's academic pursuits are continued while she's in our care. What's more, we understand that all girls don't learn the same way. This insight has led to the [development](#) of a unique academic program not found anywhere else in the country.

Trinity Is a Step Above Other Schools for Troubled Teens

Was school not your daughter's favorite subject? Don't worry. That's true of most troubled teens. Lack of focus and motivation plus discipline problems can cause girls to view school as the enemy. The instructors at Trinity Teen Solutions (TTS), however, go great distances to make learning interesting and fun. In addition to independent book study through a nationally accredited program, your daughter will also learn through experiential education, adventure education and environmental education.

We tap into her unique learning style, then couple her customized curriculum with individual attention (1:7 Instructor-to-student ratio) and small class sizes (only 14 girls per class). Unlike a typical Catholic boarding school that serves up a heavy schedule, TTS instructors focus on two to three courses at a time for just three hours per day. In this type of school, troubled teens frequently find themselves academically successful for the first time in their lives! This is an excellent motivator to keep each girl on the path to earning her high school diploma and entering college if she chooses.

Experiencing Education... Not Just Reading about It



Get Help Now

First Name

Last Name

Childs Name

Street Address

City

State

Zip

Insurance Type

Insurance Company

Phone

Email

Comments



Enter Code

SUBMIT



4/27/2016

Character Education | Trinity Teen Solutions | Trinity Teen Solutions

Outdoor learning adventures allow your daughter to live, breathe, touch and learn from everything in God's beautiful creation, not just read about it. While we absolutely agree that academic achievement must include book study, we are just as adamant that experience is a phenomenal teacher. This method of learning (called experiential education) is one pillar of our success and something all girls thoroughly enjoy.

Character Education

In addition to traditional courses required for graduation from a Catholic boarding school, your daughter will also participate in character education. These classes will help enlighten her about as well as build her self-discipline, compassion, respect, honesty, work ethic, obedience, tendency to forgive and standards of excellence.

Credentials

Trinity's Catholic boarding school for girls uses an independent study course that is nationally accredited by the Northwest Commission on Colleges and Universities (NWCCU), the Northwest Association of Accredited Schools (NAAS) and the Distance Education and Training Council (DETC). These programs are generally transferable to other accredited institutions.

Trinity Teen Solutions, Inc

google.com/+TrinityTeenSolutions



+ 1,756



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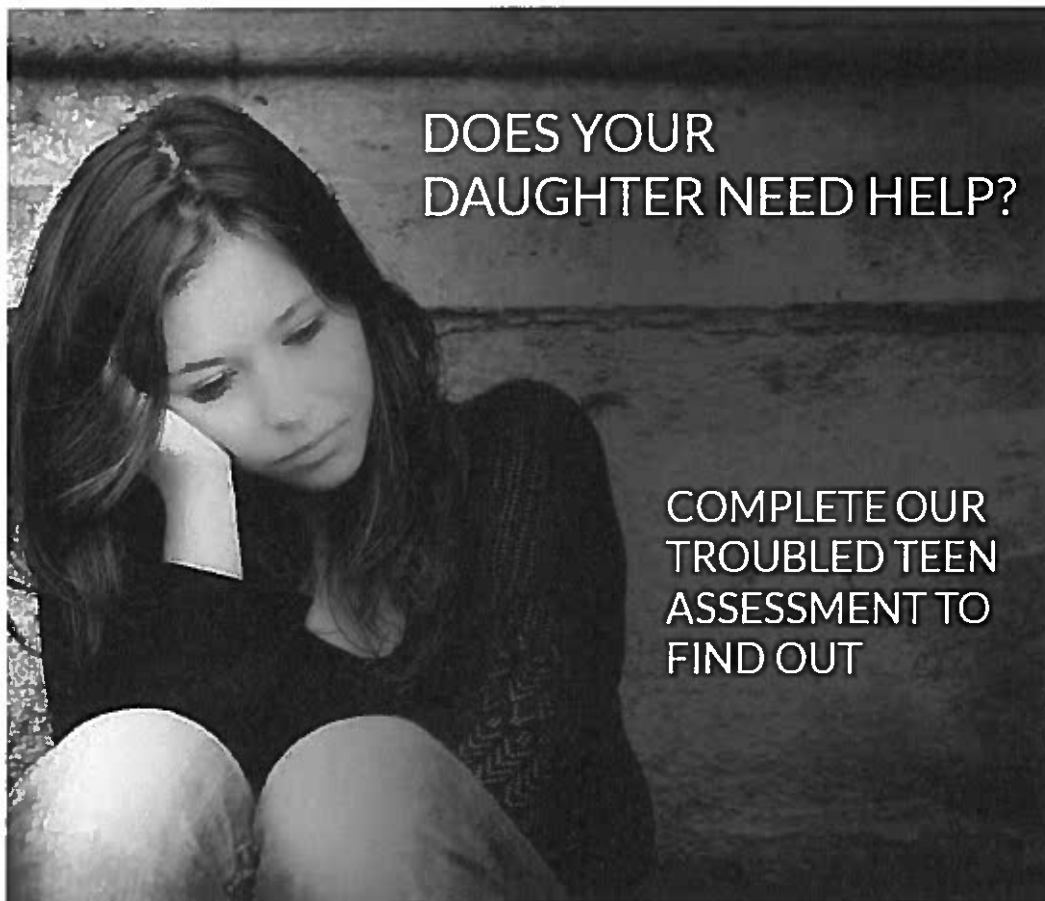
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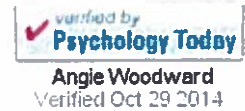
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TRINITY
TEEN SOLUTIONS

PRIVATE PAY INSURANCE APPLICATION

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mail

First Name

Last Name

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First Name

Last Name

Childs Name

Street Address

City

State

Zip



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Date Of Birth

Age

SSN

Street Address

City

State

Zip

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Relationship

Policy Holder's Phone

Policy Holder's DOB

Employer of Policy Holder

Insurance Company

Insurance Phone

ID #

Group ID #

Notes

Insurance Type

Insurance Company

Phone

Email

Comments

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+1

+ 1,756

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Enter Code

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Tweet



Share



Share



Share



Share

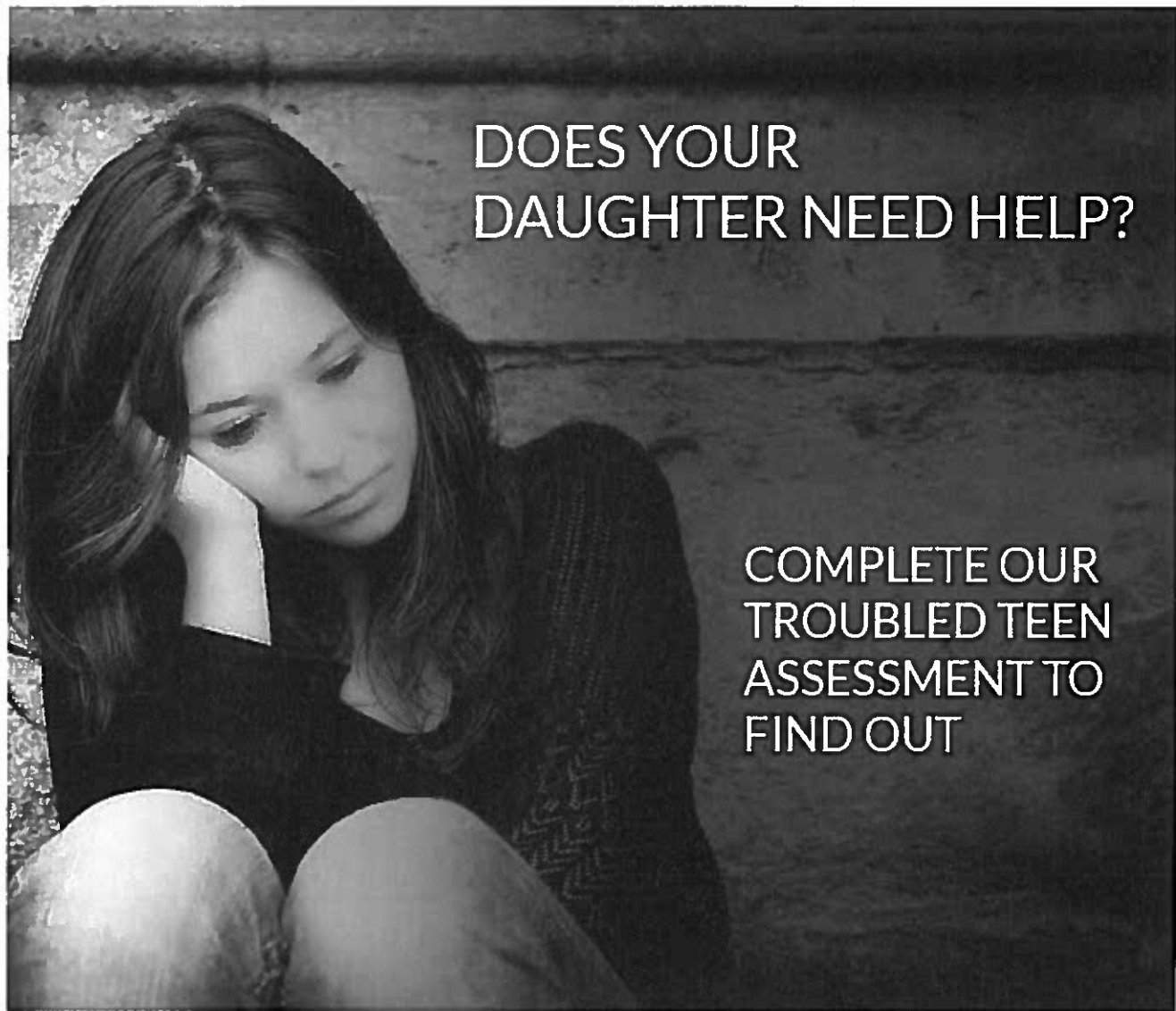
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Insurance Application | Trinity Teen Solutions



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855-631-4424



EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

TRINITY TEEN SOLUTIONS, INC.

Plaintiff,

v.

CLAIRE MALONE MATSON, CHANEL
PLANDER, AND MOLLIE NICOLE
LYNCH,

Defendants.

Civil Action No.

**DECLARATION OF CLAIRE
MALONE MATSON IN SUPPORT OF
DEFENDANTS' PETITION AND
NOTICE OF REMOVAL**

DECLARATION OF CLAIRE MALONE MATSON

I, Claire Malone Matson, make the following Declaration pursuant to 28 U.S.C. § 1746 in support of the Petition and Notice of Removal of Defendants Claire Malone Matson, Chanel Plander, and Mollie Nicole Lynch.

1. My name is Claire Malone Matson, and I am over 18 years of age and competent to make this Declaration.
2. I have personal knowledge as to each fact attested to herein.
3. I was a resident at Trinity Teen Solutions (hereinafter "Trinity"), the facility operated by Plaintiff, for a period of seventeen (17) months, from approximately July 9, 2004 through December 17, 2005.
4. Attached as Exhibit A hereto is a true and correct copy of the Financial Contract and Tuition Agreement signed by my father on March 26, 2004 in connection with my stay at Trinity.

5. I hereby consent to removal of this action from Wyoming state court to this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 4th day of May, 2016.

A handwritten signature in black ink, appearing to read "Claire Matson", written over a horizontal line.

Claire Malone Matson

EXHIBIT A

TRINITY WILDERNESS TRAILS, INC.

Financial Contract

I/We Dr. A. & Sally Matson parent(s) or guardian(s) referred to collectively as "Guardian" represent that MAISON student's name, hereafter referred to as "Student", are legal guardians and custodians of Student and have the authority and desire to place student in Trinity Wilderness Trails, Inc. referred hereafter as "TWT" or "Program". Guardian, and any successors in interest, hereby covenant, agree, and contract with TWT to place student in TWT's therapeutic ranch program with the full consent of all parties who have legal authority and control of Student. If Parent/Guardian is divorced or unmarried, Parent/Guardian agrees to provide documentation attesting to the same.

I/We, Dr. A. & Sally Matson (the "parent/Guardian"), on behalf of myself and MAISON (the "Student") acknowledge that we are enrolling in Trinity Wilderness Trails, Inc. "TWT" on TBA (enrollment date) with an anticipated discharge date of TBA.

I/We understand that TWT utilizes an all inclusive tuition fee that includes and is limited to:

- ♦ Weekly Group and individual therapy
- ♦ Psychiatric evaluation for medication evaluation (one time if needed)
- ♦ 24 hour supervision by our highly specialized staff
- ♦ Physical assessment
- ♦ Therapeutic approaches as listed in marketing material
- ♦ Family therapy sessions per treatment team recommendations and on discharge
- ♦ Adventure therapy equipment and staff
- ♦ Pharmaceutical grade nutritional supplements
- ♦ Outdoor gear- saddles and horse tack, backpacks, tents, sleeping bags, canteen, cooking utensils etc.
- ♦ Clothing-boots, shirts, long johns, pants, socks, coats, jackets, rain gear, gloves, hat etc.
- ♦ Toiletries- toothpaste, toothbrush, soap, shampoo, brush, comb, sun block, Chap-stick etc.
- ♦ Holy Cowgirl Manual-that includes personal and spiritual growth material.
- ♦ High protein, complex carbohydrate foods
- ♦ Transportation to and from Yellowstone Regional Airport in Cody, WY
- ♦ Family Intensive Therapy per treatment plan
- ♦ Weekly phone conferencing
- ♦ Disposable cameras
- ♦ TWT Academic program

I/We understand that these fees not included and anything else that is not listed above.

- ♦ Ongoing medication management by Psychiatrist
- ♦ Special therapy not listed like EMDR etc.
- ♦ Parent phone consultations with Dr. Hassler
- ♦ Family therapy not listed above
- ♦ Prescription medications
- ♦ Any other academics not listed on TWT Academics

I/We understand that TWT will get my permission in writing before accruing any fees that I/We are financially responsible for.

Costs incurred by Student should Student run away from the program, TWT will use reasonable efforts to assist the Parent/Guardian in finding the Student and in obtaining the safe return of the Student to the TWT. An accounting of the expense incurred by the Program while assisting the Parent/Guardian in finding and returning the Student to the Program will be made to the Parent/Guardian. Which may include but not limited to costs of services in searching for Student by services provided by local officials, governmental agencies, search and rescue etc. Parent/Guardian will be responsible for 50% of such expenses. However, the Parent/Guardian shall be responsible for the full amount of expenses in those instances where the Student fails to arrive at TWT.

Financial Contract (cont.)

In addition to the above tuition, Parent/Guardian agrees to pay for the following expenses of the Student's transportation from the Student's home, all medical and hospital expenses, transportation costs for removing student from the field to perform required physicals or physiological evaluations, and any other funds reasonably necessary for the health and safety of the Student.

If the Student's equipment is destroyed through neglect or abuse it will need to be repurchased by the Parent. Parent/Guardian agrees to pay in full for and make arrangements for the Student to travel to and from TWT. Guardian agrees that any such arrangements that are made for transporting Student, or contracting with professional transport agencies and that TWT will have no responsibility or culpability for any travel or any events that may occur during said travel. TWT will pick up Student from Yellowstone Regional Airport free of charge. If the Parent/Guardian arranges for flight into Billings Airport, Billings MT, the Parent/Guardian will pay \$150.00 per transport of Student.

Guardian gives permission to TWT to seek medical, hospital, dental, or psychiatric attention in the event of injury or illness, and to provide first aid as needed in the field until such care can be obtained. All costs incurred as a result of injury, illness, or treatment, remain the costs of the legal Guardians. All costs of medication needed while the Student is enrolled are the responsibility of the Guardians. Guardian authorizes any professional who provides treatment to students to release information to TWT. Guardians are obligated to provide medical insurance for the student.

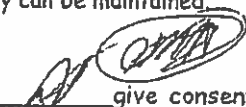
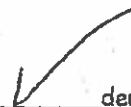
Although all or some of the tuition for the Program may be reimbursable by health insurance, the ultimate responsibility for payment and for checking on insurance details rests with the Parent/Guardian.

There may be additional staffing, medical, mental health treatment and consultation costs that may not be covered by insurance. This may include an orthomolecular work-up, new medication trials, additional counseling, therapy or consultations with other mental health professionals to avert removal from the Program. Parent/Guardian will be responsible for these additional costs.

In the event of a default by either party under this Agreement, the defaulting party agrees to pay the reasonable attorney fees, costs, and other expenses incurred by the non defaulting party in enforcing or commencing to enforce the provisions of the Agreement. In addition, if either party institutes an action to interpret or enforce this Agreement, the prevailing party shall be entitled to recover all its attorney fees, costs and other expenses incurred in such action, including any appeal taken by either party in such action or any claim or in any proceeding brought in federal bankruptcy court, including claims or proceedings which are peculiar to bankruptcy.

Parent/Guardian hereby irrevocably consents to the personal jurisdiction of, and agrees that any action shall only be brought in, the courts of the state of Wyoming and the United States of America sitting in Wyoming, for any action to enforce, interpret or construe any provisions of this Agreement or of any other agreement or document delivered in connection with this Agreement. Parent/Guardian hereby irrevocably waives any defense of improper venue or forum non conveniens to any such action brought in either of such courts.

Guardian gives permission that information from our Student's records may be used to participate in research projects if confidentiality can be maintained.

I/We  give consent  deny consent for photographs of Student to be used for promotional material with the understanding that her name will not appear on any such material.

Financial Contract (cont.)

Tuition agreement

I/We understand that if we pay in advance for services either privately or through funding options available through Sallie Mae, Prep-gate, and/or any other options, the unused portion of tuition will be refunded at the current daily rate for the student.

~~ACUTE PROGRAM~~

I/We understand that All clients will be admitted for the initial 45-60 days under acute level of care, for evaluation or for transition to another program. In order to be admitted I/WE understand that we need to commit to a minimum of 45 days, with a maximum of 60 days.

I/We understand that the daily rate is \$325.00 per day for the first 60 days. With a start date of TBA and end date of TBA in the acute program.

\$325.00/day X 45 days (minimum 45 days) total fees \$ 14625
 Plus any additional known costs (i.e. \$150.00 for transportation) \$ _____
TOTAL ADMISSION FEES REMITTED \$ _____

[Signature]
 Parent/Guardian signature

3/26/04
 Date

~~SUBACUTE PROGRAM~~

I/We understand that after completion of the initial 60 days we can transition our daughter into the sub-acute program.

I/We would like to reserve a spot for our daughter in the subacute program. To begin after completion of the initial 60 day program, with a start date of _____.

I/We understand that we will be billed monthly at a rate of \$235.00 per day, with the tuition fees due on the first of the month. TWT will prorate the first invoice to achieve a first of the month billing cycle.
 (you may at a later date enroll in the subacute program if space is available).

\$235.00/day X 30 days for a total monthly tuition of \$7050.00

 Parent/Guardian signature

 Date

Financial Contract (cont.) Tuition agreement

RESIDENTIAL PROGRAM

I/We understand that after completion of the initial 60 days or anytime at the end of a month in the sub-acute program we can transition our daughter into the residential program.

I/We understand that this is a 6 month commitment in order to get the discounted rate of \$195.00 per day.

I/We would like to reserve a spot for our daughter in the residential program, with a start date of _____ and a completion date of _____.

I/We understand that we will be billed monthly at a rate of \$195.00 per day, with the tuition fees due on the first of the month. TWT will prorate the first invoice to achieve a first of the month billing cycle. (you may at a later date enroll in the residential program if space is available).

\$195.00/day X 30 days for a total monthly tuition of \$5850.00

Parent/Guardian signature

Date

I/We understand if for any reason student is absent, on vacation, or visiting family etc. that we are still financially responsible for the daily tuition rate.

Parent/Guardian understands that TWT reserves the right to terminate this Agreement at any time if financial account is not kept in good standing, becomes delinquent, any checks are insufficient or returned, or any other form of payments not being honored.

I/We hereby acknowledge that we have read the Agreement and that we understand and agree to its provisions. This Agreement constitutes the entire Agreement between the Parties.

Signature of Parent or Guardian

Printed Name

Date

Signature of Parent or Guardian

Printed Name

Date

Signed and accepted this _____ day of _____, 20____ by Trinity Wilderness Trails Inc.

Authorized Representative of Trinity Wilderness Trails, Inc.

Title

Full payment by check, certified check or wire transfer is required prior to placement and should be sent overnight mail to: Trinity Wilderness Trails, Inc. Attn. Admissions 89 RD 8RA Powell, WY 82435

EXHIBIT

D

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

TRINITY TEEN SOLUTIONS, INC.

Plaintiff,

v.

CLAIRE MALONE MATSON, CHANEL
PLANDER, AND MOLLIE NICOLE
LYNCH,

Defendants.

Civil Action No.

**DECLARATION OF MOLLIE
NICOLE LYNCH IN SUPPORT OF
DEFENDANTS' PETITION AND
NOTICE OF REMOVAL**

DECLARATION OF MOLLIE NICOLE LYNCH

I, Mollie Nicole Lynch, make the following Declaration pursuant to 28 U.S.C. § 1746 in support of the Petition and Notice of Removal of Defendants Claire Malone Matson, Chanel Plander, and Mollie Nicole Lynch.


1. My name is Mollie Nicole Lynch, and I am over 18 years of age and competent to make this Declaration.
2. I have personal knowledge as to each fact attested to herein.
3. I was a resident at Trinity Teen Solutions (hereinafter "Trinity"), the facility operated by Plaintiff, from approximately July 11, 2010 through July 27, 2012.

4. It is my understanding that my parents spent approximately \$223,000.00 for my two year and two week stay at Trinity.

5. I hereby consent to removal of this action from Wyoming state court to this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 4 day of May, 2016.



Mollie Nicole Lynch

EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

TRINITY TEEN SOLUTIONS, INC.

Plaintiff,

v.

CLAIRE MALONE MATSON, CHANEL
PLANDER, AND MOLLIE NICOLE
LYNCH,

Defendants.

Civil Action No.

**DECLARATION OF O. MARK JERDE
IN SUPPORT OF DEFENDANTS'
PETITION AND NOTICE OF
REMOVAL**

DECLARATION OF O. MARK JERDE

I, O. Mark Jerde, make the following Declaration pursuant to 28 U.S.C. § 1746 in support of the Petition and Notice of Removal of Defendants Claire Malone Matson, Chanel Plander, and Mollie Nicole Lynch.

1. My name is O. Mark Jerde, and I am over 18 years of age and competent to make this Declaration.

2. I have personal knowledge as to each fact attested to herein.

3. My daughter, Michelle N. Jerde, was a resident at Trinity Teen Solutions (hereinafter "Trinity"), the facility operated by Plaintiff, from approximately February 2005 through December 2006.

4. During the time of my daughter's stay at Trinity, I made payments to Plaintiff for services rendered.

5. I made payments to Trinity in the form of monthly checks made out to Plaintiff. True and correct copies of some, but not all, of the checks I made out and sent to Plaintiff in the

year 2005, from a checking account which has since been closed, are attached hereto as Exhibit A.

6. As can be seen in the check images attached as Exhibit A, for services rendered from February 2005 through January 2006, excluding September 2005, I made payments in excess of \$70,000, with a typical monthly payment of approximately \$6,000.00.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 17th day of May, 2016.



O. Mark Jerde

EXHIBIT A

In quietness and in confidence shall be your strength.
Isaiah 30:15

MARK JERDE 1-93
MARY JANE JERDE
[Redacted]

3718

2-14-05 Date 2-16-05

Pay to the Order of Trinity Teen Solutions, Inc. \$ 14,625.00

Fourteen thousand six hundred twenty-five only Dollars

BANK OF AMERICA
BETHESDA, MD 20817
1-800-233-3344

For Michelle Jerde Tuition Mark Jerde

[Redacted]

The earth is the Lord's and all that therein is.
Psalm 24:1

MARK JERDE 1-93
MARY JANE JERDE
[Redacted]

3915

4-17-05 Date 4-18-05

Pay to the Order of Trinity Teen Solutions, Inc. \$ 13,065.00

Thirteen thousand sixty-five only Dollars

BANK OF AMERICA
BETHESDA, MD 20817
1-800-233-3344

For stunt: 5-1-05 Mark Jerde

[Redacted]

The earth is the Lord's and all that therein is.
Psalm 24:1

MARK JERDE 1-93
MARY JANE JERDE
[Redacted]

3939

5-30-05 Date 5-30-05

Pay to the Order of Trinity Teen Solutions, Inc. \$ 5,850.00

Five thousand eight hundred fifty only Dollars

BANK OF AMERICA
BETHESDA, MD 20817
1-800-233-3344

For June 2005 Mark Jerde

[Redacted]

The earth is the Lord's, and all that therein is
Psalms 24:1

MARK JERDE 1-93
MARY JANE JERDE
[REDACTED]

3955

6-26-05 Date 7-163/520

Pay to the Order of Trinity Teen Solutions Inc. \$ 5,850.00

Five-thousand eight-hundred fifty only Dollars

BANK OF AMERICA
BETHESDA, MD 20817
1-800-235-8844

For July 05 Michelle Jerde Mark Jerde AP

[REDACTED]

MARK JERDE 1-93
MARY JANE JERDE
[REDACTED]

4005

7-25-05 DATE 7-163/520

PAY TO THE ORDER OF Trinity Teen Solutions, Inc. | \$ 5,850.00

Five-thousand eight-hundred fifty only DOLLARS

BANK OF AMERICA
BETHESDA, MD 20817
1-800-235-8844

FOR August 2005 Mark Jerde

[REDACTED]

MARK JERDE 1-93
MARY JANE JERDE
[REDACTED]

4034

9-23-05 DATE 7-163/520

PAY TO THE ORDER OF Trinity Teen Solutions, Inc. \$ 5,850.00

Five-thousand eight-hundred fifty only DOLLARS

BANK OF AMERICA
BETHESDA, MD 20817
1-800-235-8844

For Michelle J. 10-05 Mark Jerde

[REDACTED]

11/03/2005

This is a LEGAL COPY of your check. You can use it the same way you would use the original check.

5002/EB/TT

MARK JERDE 1-00
MARY JANE JERDE

4060

10-27-05

7-163628

PAY TO THE ORDER OF Trinity Teen Solutions, Inc. \$ 7,689.64
Seven thousand six hundred eighty nine & 64/100 DOLLARS ☒ ☐

BANK OF AMERICA
BETHESDA, MD 20817
1-800-235-6044BY Michelle Nov05Mark Jerde

12/05/2005

This is a LEGAL COPY of your check. You can use it the same way you would use the original check.

5002/SO/TT

MARK JERDE 1-00
MARY JANE JERDE

4073

11-30-05

7-163628

PAY TO THE ORDER OF Trinity Teen Solutions, Inc. \$ 5,850.00
Five thousand eight hundred fifty DOLLARS ☒ ☐

BANK OF AMERICA
BETHESDA, MD 20817
1-800-235-6044BY Michelle Tenda Dec 05Mark Jerde

01/04/2006

This is a LEGAL COPY of your check. You can use it the same way you would use the original check.

5002/40/TO

MARK JERDE 1-00
MARY JANE JERDE

4090

12-28-05

7-163730

PAY TO THE ORDER OF Trinity Teen Solutions \$ 5,850.00
Five thousand eight hundred fifty only DOLLARS ☒ ☐

BANK OF AMERICA
BETHESDA, MD 20817
1-800-235-6044BY Michelle J. - Jan 06Mark Jerde